EVIDENCE-BASED PUBLIC INTEREST REVIEW

Funding, Governance and Public Accountability

An Evidence-Based Examination of Reform UK

Mark Sawyer
Independent Researcher
August 2026

Publication edition • 13 August 2026

This report examines what the public record can establish about Reform UK's funding, organisational governance, operational policy feasibility, donor and influence networks, and preparations for government. It distinguishes documented fact from inference and allegation, prioritises primary evidence, and records material evidential gaps rather than filling them with assumption.

About the author

Mark Sawyer is an independent researcher and the author of this report. The investigation was conducted using publicly available records, primary-source documentation and the evidential methodology described in this report.

Publication Information

First published: August 2026

Author: Mark Sawyer

© 2026 Mark Sawyer. All rights reserved.

Independence statement

This report was independently researched and produced. It is not commissioned by, produced on behalf of, or affiliated with any political party or campaign organisation.

Executive Summary

This investigation began with a simple accountability question: how much can an outside reader independently establish about the money, structures, policies and preparation behind a party presenting itself as a government-in-waiting? The resulting evidence is more complex than either a promotional or hostile caricature of Reform UK.

The report finds a political organisation that has become materially more professional and better resourced, but whose rapid growth, concentrated funding, ambitious policy programme and claims of exceptional readiness create correspondingly high demands for transparency, assurance and implementation evidence.

On funding, the report identifies substantial concentration around a small number of major donors and examines the access, relationships and policy intersections surrounding them. Concentration and access are legitimate subjects for scrutiny, but the report does not treat donation, association or policy alignment as proof that a donor purchased an outcome.

On governance, the evidence distinguishes formal constitutional powers from the way authority operates in practice, and separates organisational design from the conduct or performance of individual councillors and councils. The central issue is not whether Reform possesses rules and structures, but whether those structures provide sufficiently transparent, resilient and accountable control as the organisation scales.

On flagship removal and border policies, the report finds that legal authority is only one component of delivery. Casework throughput, identity and documentation, detention estate, transport, receiving-state cooperation, maritime constraints, procurement, staffing and sequencing can each determine what is operationally achievable. A constraint is not treated as proof of impossibility; the test is whether the published plan recognises, quantifies and credibly resolves it.

On donors, networks and influence, the report applies a deliberately demanding causal standard. Donation, access, association and policy alignment can each be evidenced. None automatically establishes quid pro quo, improper conduct or causal control over policy. Where the stronger proposition cannot be demonstrated, the report says so.

On preparation for government, the evidence supports a significant conclusion: Reform UK is demonstrably preparing. It has created a formal preparation programme, recruited expertise, developed machinery-of-government proposals and shown real legislative activity. What the public record does not yet independently substantiate is the stronger claim of a fully assured, bill-by-bill and implementation-ready first-year programme. The result is a material verification gap between preparation claimed and preparation outsiders can currently audit.

Key Findings

- Funding concentration is a material accountability issue. The report identifies major reliance on a small number of donors, while separating that fact from unsupported claims of purchased policy.
- Formal governance arrangements exist, but constitutional design, practical control, councillor conduct and council performance must be assessed separately.

- Several high-profile policy commitments face delivery constraints that cannot be solved by legislation alone; operational capacity and external cooperation are recurring dependencies.
- Published headline costings are not equivalent to implementation-ready financial models. Reproducible assumptions, sensitivity testing and delivery sequencing matter.
- Donor and policy networks warrant scrutiny where documentary links exist, but causal influence is attributed only where evidence supports it.
- Reform's preparation for government is genuine and increasingly institutionalised; the strongest claims about the scale and readiness of unpublished legislative work remain unverified from the public record.
- The report does not conclude that Reform UK is incapable of governing, that every policy would fail, or that every allegation made by opponents is true. Its conclusions are limited to what the evidence supports.

Contents

PART I.....6
1.1 Why This Investigation Exists.....6
1.2 The Questions Tested.....6
1.3 Scope and Exclusions.....6
1.4 Evidence Hierarchy.....7
1.5 Evidential Classifications.....7
1.6 What Absence of Evidence Means.....7
1.7 How Feasibility Is Assessed.....8
1.8 Standard of Fairness.....8
1.9 Reproducibility and the Companion Volume.....8
PART II.....9
2.1 Why the Context Matters.....9
2.2 Institutional Continuity and Change.....9
2.3 From Campaign Vehicle to Permanent Organisation.....9
2.4 Electoral Growth Changes the Burden of Proof.....10
2.5 The Government-in-Waiting Claim.....10
2.6 The Accountability Consequence.....10
PART III.....11
3.1 Christopher Harborne: Funding, Access and Policy Intersections.....11
3.2 Ideological Money: Jeremy Hosking and Ben Delo.....19
3.3 Related-Party Finance: Richard Tice, Britain Means Business and TISUN.....26
3.4 The Cottrell Network: Source of Funds, Access and the Criminal Investigation.....33
3.5 The Funding Architecture: What the Networks Show Together.....43
3.6 Evidence Audit and Visual Funding Map.....52
PART IV.....57
4.1 Democratised — But How Democratic?.....58
4.2 Control in Practice: Dissent, Discipline and the Farage Leadership Model.....67
4.3 Growth Without Infrastructure? Candidates, Councillors and Organisational Capacity.....76
4.4 The First Test of Government: What Happened in Reform-Run Councils?.....85
4.5 The Attrition Audit: What Actually Happened to Reform's Councillors?.....95
4.6 From Attrition to Administration: Does Churn Affect Council Performance?.....103
4.7 Governance Scorecard: Is Reform Institutionally Ready for National Government?.....108
PART V.....117
5.1 From Promise to Statute: A Policy Feasibility Audit.....117
5.2 The £42 Billion Question: Costing Mass Deportation.....128
5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?.....140

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command.152
5.5 Operation Fortress at Sea: Interception, Rescue and the Law of the Channel.....161
5.6 The Detention State: Building and Operating 24,000 Secure Places.....170
5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State.....181
5.8 Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person.....192
5.9 Treaty Override by Emergency: Can Reform Simply Disapply Refugee, Torture and Trafficking Law?203
5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?.....214
5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?.....226
5.12 The Detention Economy: Procurement, Contractors and Who Could Profit?.....239
5.13 The Critical Path: Can the Deportation Machine Be Built in Time?.....251
5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict.....264
PART VI.....277
6.1 From Donation to Influence: The Evidence Test.....277
6.2 Christopher Harborne: The Chronology Test.....288
6.3 Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?.....298
6.4 Christopher Harborne, Tax and the Britannia Card: Who Would Benefit?.....307
6.5 The Donor–Policy Matrix: Is There a Wider Pattern?.....317
6.6 Ben Delo: Second Crypto Mega-Donor - Independent Confirmation or New Influence?.....329
6.7 Ben Delo: The Network Behind the Money.....337
6.8 Nick Candy: When a Mega-Donor Becomes Part of the Party Machine.....349
6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?.....360
6.10 Bassim Haidar: The Candy Conversion Case.....372
6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor.....385
6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance 399
6.13 Richard Tice: Leader, Lender, Company Controller and Related-Party Risk.....412
6.14 Part VI Synthesis: What the Donor Network Actually Shows.....423
PART VII.....432
7.1 Who Actually Makes Reform UK Policy?.....433
7.2 The Policy-Making Chain: Orr, Kruger, Farage, the Party Board and the External Network.....441
7.3 Policy Case Studies: Announcement First or Assurance First?.....449
7.4 The "Thousands of Pages" Test: Where Is the Draft Legislation?.....458
7.5 Who Are the Drafters? Mapping Reform's Legislative-Preparation Network.....465
7.6 Can the First-Year Legislative Programme Actually Pass?.....469
7.7 From Legislation to Implementation: Can the State Do What the Bill Says?.....472
7.8 Part VII Synthesis: How Ready Is Reform to Govern?.....476

PART I
PURPOSE, SCOPE AND METHOD

1.1 Why This Investigation Exists

Reform UK increasingly asks voters to assess it not simply as a vehicle for protest, but as an organisation capable of exercising national power. That changes the appropriate standard of scrutiny. A party seeking government can reasonably be examined not only for the popularity of its promises, but for the transparency of its funding, the resilience of its governance, the feasibility of its policies, the networks surrounding decision-makers and the quality of its preparation for office.

The purpose of this report is therefore neither to promote nor to disqualify Reform UK. It is to test public claims against public evidence. Where the record supports Reform, that is recorded. Where a criticism cannot be substantiated, it is not adopted merely because it is politically convenient. Where a stronger claim outruns the available evidence, the report describes the gap rather than filling it with assumption.

1.2 The Questions Tested

- Funding and transparency: who finances the party, how concentrated is that funding, and what can the public record establish about major donors and related interests?
- Governance and organisational control: what formal structures exist, how does authority operate in practice, and what does the party's expansion reveal about organisational resilience and accountability?
- Policy feasibility: do flagship commitments identify the legal, financial, administrative, diplomatic and operational dependencies required for delivery?
- Donors, networks and influence: what relationships, access and policy alignments can be documented, and where does the evidence stop short of proving causal influence?
- Preparation for government: what infrastructure, personnel, legislative work and implementation planning are publicly visible, and how far do they substantiate claims of exceptional readiness?

1.3 Scope and Exclusions

The investigation concentrates on matters relevant to public accountability and governing capacity. It does not attempt to catalogue every Reform policy, every public controversy, every statement by a representative or every criticism made by opponents. Nor does it treat social-media virality as evidence. Individual incidents are included where they illuminate a wider question of governance, control, feasibility, funding or institutional readiness.

The report also distinguishes the party from the conduct of every person who supports it. Evidence concerning a donor, councillor, adviser or associated organisation is not automatically attributed to Reform UK as an institution unless the connection is itself relevant and evidenced.

1.4 Evidence Hierarchy

Primary and official evidence is preferred wherever available: Electoral Commission records, Companies House filings, parliamentary material, legislation, government publications, official statistics, court or regulatory material, and Reform UK's own constitutions, policy documents, statements and publications. The Electoral Commission requires registered political parties to maintain structures and financial processes capable of complying with electoral law; registration therefore provides a regulatory baseline, not a general certificate of governance quality or policy feasibility.

Reputable secondary reporting is used where it supplies verifiable context, interviews, quotations or information not reasonably obtainable from a primary source. Commentary, partisan claims and social-media posts may identify questions for investigation, but are not treated as proof of the propositions they assert.

1.5 Evidential Classifications

Classification	Meaning
ESTABLISHED	Supported directly by sufficiently reliable documentary or primary evidence.
SUPPORTED INFERENCE	Not directly stated by the evidence, but a conclusion reasonably supported by the documented facts.
UNVERIFIED	Asserted or plausible, but the evidence examined is insufficient to establish it independently.
ALLEGATION	A claim made by an identified source that is not adopted as fact without corroboration.
NOT ESTABLISHED	The investigation did not find evidence sufficient to support the proposition; this does not necessarily prove the opposite.

1.6 What Absence of Evidence Means

A recurring discipline throughout the report is that absence of public evidence is not automatically evidence of absence. A party may possess unpublished legal advice, draft legislation, internal modelling or operational plans. Where such material is not publicly auditable, the appropriate conclusion is normally that the claim is unverified from the public record — not that the material does not exist.

The reverse rule is equally important. Repetition by a party, politician, journalist, opponent or supporter does not convert an assertion into independent evidence. Specific claims of cost, capacity, legality or readiness are tested against evidence appropriate to that claim.

1.7 How Feasibility Is Assessed

Policy feasibility is treated as a chain. Parliamentary authority may be necessary, but it is rarely sufficient. Depending on the policy, delivery can also require finance, staff, physical estate, procurement, information systems, casework, regulatory compliance, courts, foreign-government cooperation and time. A constraint is not treated as proof that a policy is impossible. The test is whether the proposal recognises the constraint and provides a credible route through it.

This is particularly important for a prospective government in the United Kingdom because transitions can occur extremely quickly. Institute for Government research stresses that opposition preparation matters precisely because ministers can move from opposition into control of departments almost immediately after an election, making advance work on structures, people, priorities, legislation and implementation consequential.

1.8 Standard of Fairness

The report applies the same standard in both directions. Evidence favourable to Reform is not withheld because it weakens a criticism; evidence adverse to Reform is not softened because it is politically contentious. Strong conclusions require strong evidence. Where several interpretations remain possible, that uncertainty is stated.

This matters especially in the examination of donors and networks. Donation, access, association and policy alignment may each be legitimate matters of public interest. None automatically proves a quid pro quo, corruption or causal donor control over policy. Those stronger propositions require stronger evidence.

1.9 Reproducibility and the Companion Volume

The Main Report is designed to carry the argument without forcing the reader through every working source register and research note. Detailed supporting material removed during consolidation is preserved in the Evidence & Sources Compendium. The purpose of that separation is readability without sacrificing auditability.

PART II
FROM INSURGENT PARTY TO CLAIMANT FOR GOVERNMENT

2.1 Why the Context Matters

The later Parts of this report test Reform UK against standards normally applied to organisations seeking national power. Part II explains why that is now the relevant frame. Reform's significance does not rest on any single election result, opinion poll or media cycle. It rests on the combination of parliamentary representation, local organisation, fundraising, public profile, policy development and an explicit programme of preparation for government.

That does not make Reform the Official Opposition, a constitutional status attached to the second-largest party in the House of Commons. Nor does electoral momentum guarantee future office. It does mean that scrutiny confined to whether Reform is an effective protest movement is no longer sufficient.

2.2 Institutional Continuity and Change

Reform UK emerged from the political organisation previously known as the Brexit Party. The change of name did not erase the organisation's institutional history, but the party has subsequently altered its governance, membership offer, personnel, policy range and ambitions. The relevant question for this report is therefore not whether the two labels are rhetorically interchangeable, but what institutional continuities and changes matter to present-day accountability.

As a registered political party, Reform operates within the framework of the Political Parties, Elections and Referendums Act 2000. Electoral Commission registration requires a constitution describing party structure and organisation, a financial scheme, registered officers and continuing compliance with electoral-finance obligations. Those requirements provide the legal-regulatory floor against which the more detailed governance questions in Part IV are examined.

2.3 From Campaign Vehicle to Permanent Organisation

A campaign organisation can optimise for speed, message discipline and a small leadership group. A durable political party faces different demands: member participation, candidate selection, disciplinary processes, local branches, elected representatives, financial controls, policy development and succession. Growth therefore changes the governance problem. Structures that function at small scale may become more consequential — and more exposed — as membership, money and elected representation increase.

This report treats that transition as analytically important. Organisational professionalisation can occur alongside unresolved weaknesses; equally, evidence of internal disputes or individual misconduct does not by itself demonstrate institutional failure. Part IV tests those propositions separately.

2.4 Electoral Growth Changes the Burden of Proof

The more plausible a party's route to power becomes, the less adequate it is to assess its programme solely as campaign communication. Commitments that may once have functioned primarily as political signals become prospective instructions to departments, regulators, police, courts, contractors, local government and — in some cases — foreign states.

That is why Parts V and VII focus heavily on implementation. The question is not merely whether Parliament could enact a policy. It is whether the state could deliver the promised outcome at the proposed scale, cost and speed.

2.5 The Government-in-Waiting Claim

Reform has increasingly presented itself as preparing for national government rather than simply seeking influence over the established parties. That claim is consequential. In the UK, a change of government can take effect almost immediately after a general election. Institute for Government research identifies structures, people and policies as central areas of advance preparation and emphasises the need to prioritise legislation and implementation before taking office.

Preparation itself should therefore count in Reform's favour where it can be demonstrated. A serious assessment must distinguish between the existence of preparation and the stronger question of its completeness. Part VII does exactly that: it examines the preparation programme, policy and legal networks, legislative activity, machinery-of-government proposals and implementation evidence rather than assuming either readiness or incompetence.

2.6 The Accountability Consequence

Taken together, Reform's development produces the central premise for the remainder of this report: claims to governmental seriousness invite governmental scrutiny. Major donors can be examined for transparency without presuming corruption. Constitutional arrangements can be tested without presuming bad faith. Policies can be stress-tested without presuming that radical change is impossible. Preparation for office can be credited without treating every claim of readiness as verified.

Parts III–VII therefore apply progressively harder tests: who funds the organisation; how it is governed; whether major commitments can survive contact with legal and operational reality; what can be established about the networks surrounding it; and finally whether the public evidence supports the proposition that Reform is ready to govern.

PART III

PART III EVIDENTIAL STANDARD — Donation, access, association and policy alignment can be established from records where evidence permits. They do not, without additional evidence, establish improper conduct, a quid pro quo or causal donor control over policy. This standard applies throughout Part III and avoids repeating the same qualification in every case study.

Political Funding, Influence and Transparency

3.1 Christopher Harborne: Funding, Access and Policy Intersections

EVIDENCE SUMMARY

Purpose: Examine the scale and nature of Christopher Harborne's financial relationship with Reform UK and Nigel Farage, including declared party donations, personal financial support, documented access, relevant commercial interests and areas of apparent policy alignment.

Evidence confidence: ★★★★★ declared political funding | ★★★★☆ documented personal/business relationships | ★★★☆☆ possible policy influence

Period examined: 2019–8 August 2026

Executive Brief

Christopher Harborne occupies an exceptional position within the financing of Reform UK and its political predecessor, the Brexit Party. For corporate-law purposes, the report distinguishes the historic party company (no. 11694875) from the current Reform UK Party Limited (no. 16260766).

Analysis undertaken for this report using Electoral Commission data identifies approximately £25.19 million in core declared political donations attributable to Christopher Harborne after clearly matched duplicate pre-election reporting records are removed from the analytical total.

Against approximately £45.29 million of core declared donations identified within the same cleaned dataset, Harborne alone represents approximately 55.6% of the analysed donation total. This makes him, by a very substantial margin, the dominant financial supporter identified within the dataset.

The financial relationship extends beyond donations to the party. In April 2024, Harborne gave Nigel Farage a separate £5 million personal gift. The Parliamentary Commissioner for Standards formally opened an investigation on 13 May 2026 into a possible breach of Rule 5 concerning failure to register an interest. Parliament currently records that investigation as suspended from 8 July 2026 following Farage ceasing to be an MP.

Harborne's business interests include cryptocurrency, aviation fuel and defence-related investment. Reform UK has adopted crypto-friendly policies and strongly opposes existing Net Zero policies. These overlaps are legitimate matters of public interest, but they are not evidence by themselves that Harborne purchased, dictated or caused Reform UK policy.

£25.19m	Core declared party donations identified
55.6%	Share of analysed core declared donations
£5m	Separate personal gift to Nigel Farage
13 May 2026	Standards investigation opened
8 July 2026	Investigation suspended

1. The Political Funding Relationship

Harborne's relationship with Nigel Farage's political organisations did not begin with the recent growth of Reform UK. Electoral Commission records document substantial support dating back to the Brexit Party period in 2019. Those historic references concern the political-party lineage; they should not be taken to mean that today's Reform UK Party Limited (company no. 16260766) was the corporate recipient in 2019.

The largest recent example was a £9 million donation accepted by Reform UK in August 2025. Electoral Commission data subsequently recorded another £3 million donation accepted on 12 November 2025 and a further £3 million on 23 January 2026.

The significance is not merely the absolute size of the donations but their concentration. Our cleaned dataset identifies approximately £45.29 million in core declared donations over the period covered, of which approximately £25.19 million is attributable to Harborne.

WHY THIS MATTERS

A high concentration of funding does not demonstrate corruption or prove control. It does create a legitimate governance question: where one individual supplies more than half of analysed declared donations, voters may reasonably ask about the donor's relationship with the leadership, political objectives, commercial interests, access and any evidence of policy influence.

2. The Separate £5 Million Personal Gift

Party donations and personal gifts should not be treated as the same thing. Harborne's declared donations to Reform UK appear in the political finance system; the £5 million paid directly to Nigel Farage in April 2024 is a separate issue.

The existence of the payment was publicly reported in April 2026. Farage said Harborne was deeply concerned about his personal safety; Reform described the payment as a personal unconditional gift and said the relevant rules had been followed.

The parliamentary issue is whether the gift fell within House of Commons registration rules once Farage became an MP. The Commissioner formally opened a Rule 5 investigation on 13 May 2026. Parliament states that the existence of an investigation does not mean that the rules have been broken.

As of 8 August 2026 the inquiry is recorded as suspended from 8 July 2026, following Farage ceasing to be an MP. Under the Commons procedural protocol, an inquiry is suspended when a Member leaves the House and resumes if the former Member is returned; otherwise the Commissioner considers whether resumption remains appropriate and proportionate.

IMPORTANT CONTEXT

A separate January 2026 standards case found 17 late-registration breaches of Rule 5. The Commissioner concluded those breaches were inadvertent and resulted from staffing and administrative problems; Farage accepted responsibility and apologised. That earlier case is relevant background but is not evidence that the £5 million gift breached the rules.

3. The Timing Question

Farage originally emphasised that when he received the money in April 2024 he was not an MP and had publicly stepped back from frontline politics. He did not announce that he would stand in the July 2024 general election until June.

More recent reporting has complicated that chronology: Farage acknowledged in August 2026 that he had discussed a possible return to Reform's leadership with Richard Tice and George Cottrell months earlier than his public announcement. That does not establish that the Harborne gift was

connected with those discussions, but it makes the question of whether the payment could reasonably have been regarded as related to political activity more significant.

Date	Event
2019	Harborne becomes a major supporter of the Brexit Party.
April 2024	Harborne gives Farage £5 million personally.
June 2024	Farage announces his return and candidacy.
July 2024	Farage elected MP for Clacton.
May 2025	Reform announces a major crypto-policy package.
Aug 2025	Harborne gives Reform £9 million.
Nov 2025	Further £3 million donation.
Jan 2026	Further £3 million donation.
13 May 2026	Standards investigation opened.
8 Jul 2026	Investigation suspended when Farage ceases to be an MP.

4. Access and Personal Relationship

Public reporting indicates that the Harborne–Farage relationship extends beyond ordinary donor correspondence. Harborne has provided financial support connected with Farage's travel, including travel associated with Donald Trump's inauguration, while reporting has also placed Farage at Harborne's private 60th birthday gathering in Thailand.

This establishes that Harborne is not simply an anonymous contributor whose involvement ends when a bank transfer is completed. It does not establish improper lobbying or a decision made in exchange for money.

EVIDENCE CHECK

Established: extensive political funding; a £5m personal gift; additional financial support; direct personal contact.

Not established: improper lobbying; decisions made in exchange for money; Harborne dictating Reform policy.

5. Business Interests

Cryptocurrency

Harborne has substantial cryptocurrency interests, including exposure to the Tether and Bitfinex ecosystem.

Aviation fuel

He founded AML Global, an aviation-fuel business.

Defence-related investment

Reporting has identified interests involving defence company QinetiQ, while AML Global has undertaken fuel-related business connected with US defence contracting.

6. Cryptocurrency: The Strongest Policy Intersection

Reform UK has positioned itself strongly in favour of cryptocurrency. In May 2025 Nigel Farage announced proposals including a Crypto Assets and Digital Finance Bill, lower capital-gains tax on cryptoassets, a Bitcoin digital reserve, banking protections for legitimate crypto users and acceptance of cryptocurrency donations from eligible donors.

Harborne is simultaneously one of the party's largest financial backers and a significant cryptocurrency investor. That creates an obvious question about influence, but the current evidence does not justify answering it affirmatively.

Former Farage communications chief Gawain Towler has reportedly said he believed Farage's interest in cryptocurrency dated to around early 2019, when Harborne entered his political orbit. Separately, a businessman acquainted with Harborne's family told the Guardian that he believed Harborne's involvement in British politics was partly motivated by influencing the future direction of cryptocurrency. Harborne's representatives have challenged attempts to connect unrelated events or donation timing to policy outcomes.

ASSESSMENT

Established: Harborne has major crypto interests; he became a major supporter from 2019; Farage later became a prominent crypto advocate; Reform proposed policies favourable to crypto investors. Reported testimony suggests a possible influence relationship. Not established: a quid pro quo, a contractual arrangement, or proof that Harborne bought or dictated crypto policy.

7. Aviation Fuel and Net Zero

Harborne's aviation-fuel interests create another apparent policy overlap. Reform's published programme includes a commitment to scrap Net Zero policies and expand domestic energy production.

An aviation-fuel entrepreneur could reasonably have commercial interests affected by environmental, carbon and energy policy. However, the evidential link here is substantially weaker than the cryptocurrency relationship.

The defensible conclusion is therefore: commercial-policy overlap exists; causation has not been established.

8. Defence Interests

Harborne has also held investments connected with the defence sector. This is relevant context because Reform has significant defence policies and AML Global has reportedly undertaken fuel-related business connected with US defence contracting. Unless further evidence demonstrates lobbying, policy discussions or specific requests, this connection should remain contextual rather than accusatory.

9. Harborne's Position

Fair assessment requires the donor's own position to be represented. Harborne has publicly defended the legitimacy of his political involvement and has expressed interest in issues including cryptocurrency regulation and, at one stage, possible cooperation between Reform and the Conservatives.

Reform and Farage have rejected suggestions that Harborne's funding purchased political influence. Regarding the £5 million personal payment, Reform described it as an unconditional personal gift and said the relevant rules had been followed.

10. Evidence Assessment

Question	Assessment
Is Harborne the dominant financial supporter in the analysed dataset?	Yes — approximately £25.19m.

Question	Assessment
Does he account for a substantial proportion of analysed core donations?	Yes — approximately 55.6%.
Did he also provide substantial personal financial support to Farage?	Yes — a separate £5m gift has been publicly confirmed.
Is there an official standards investigation?	Yes — opened 13 May 2026 and currently suspended following Farage ceasing to be an MP.
Do Harborne's commercial interests overlap with Reform policy?	Yes — particularly cryptocurrency and, more generally, aviation/energy and defence.
Is there proof that Harborne purchased or dictated Reform policy?	No evidence establishing that has been identified.

WHAT THE EVIDENCE DOES NOT SHOW

This report has not identified evidence establishing that Christopher Harborne purchased Reform UK policy; that Nigel Farage agreed to promote particular policies in exchange for donations; that Harborne dictated Reform's cryptocurrency programme; that Reform's Net Zero policy was adopted because of Harborne's aviation interests; that the £5m personal gift constituted a bribe; or that the existence of the gift itself amounted to an offence.

The Central Democratic Question

The significance of the Harborne relationship ultimately lies in scale. Where one individual provides more than half of a party's analysed declared donations, provides millions of pounds personally to its leader, enjoys documented access to that leader, and has substantial commercial interests intersecting with areas of party policy, scrutiny is a normal function of political transparency.

"Does the public have sufficient information to understand the nature, extent and potential significance of the relationship between Reform UK's dominant financial supporter and its political leadership?"

Key Findings

- Harborne is the dominant donor identified in this report's Reform UK funding analysis.
- The cleaned Electoral Commission dataset attributes approximately £25.19 million in core declared political donations to him.
- This represents approximately 55.6% of the core declared donation value identified in the analysed dataset.

- Harborne separately gave Nigel Farage £5 million personally in April 2024.
- Parliament opened a formal investigation into whether Farage failed to register an interest; the inquiry is currently suspended under parliamentary procedure.
- Harborne's relationship with Farage includes documented personal access and additional financial support.
- Harborne has significant interests in cryptocurrency, aviation fuel and defence-related investments.
- The cryptocurrency relationship provides the strongest evidential basis for further investigation into possible donor influence.
- No evidence identified by this report presently demonstrates a quid pro quo arrangement or proves that Harborne purchased Reform UK policy.

LIVE INVESTIGATION

This chapter should be treated as live. The parliamentary standards investigation concerning the £5 million gift has not reached a conclusion. New disclosures could strengthen, weaken or materially alter the assessment. Last reviewed: 8 August 2026.

Political Funding, Influence and Transparency

3.2 Ideological Money: Jeremy Hosking and Ben Delo

EVIDENCE SUMMARY

Purpose: Examine two major external donors whose public statements provide unusually useful evidence about why wealthy individuals choose to support Reform UK. The chapter distinguishes ideological support, policy advocacy, commercial-sector overlap and evidence of transactional influence.

Evidence confidence: ★★★★☆ Hosking motive and policy alignment | ★★★★☆ Delo stated motive | ★★★☆☆ inference from commercial-policy overlap

Primary evidence base: project Electoral Commission dataset; donor statements reported by the Financial Times, Reuters and The Guardian; Reform UK published policy; US Department of Justice clemency records.

Last reviewed: 8 August 2026.

Executive Brief

Political donations are often discussed as though only two possibilities exist: either a donor gives money with no expectation beyond supporting a cause, or the donor is purchasing policy. The evidence is usually more complicated.

Jeremy Hosking and Ben Delo illustrate two forms of lawful ideological political funding. Both are major Reform UK supporters, but the public evidence concerning their motives differs.

Hosking has openly connected his political giving to identifiable ideological and policy objectives. He has funded Brexit campaigns, supported the Reclaim Party, offered financial support to Conservative candidates willing to endorse a four-point cultural programme including withdrawal from the European Convention on Human Rights, and returned to Reform UK in 2024 specifically praising its embrace of what he described as Britain's cultural crisis.

Delo, a co-founder of cryptocurrency exchange BitMEX, gave Reform UK £4 million in early 2026 and publicly described the donation as his first venture into political activism. His stated case centred on the condition of Britain, distrust of established elites and free speech. His commercial background creates a notable overlap with Reform's crypto-friendly programme, but no evidence identified by this report establishes that cryptocurrency policy was a condition of his funding.

These cases therefore demonstrate something important: wealthy donors can quite openly use political funding to advance causes and ideological objectives without that fact, by itself, establishing corruption or a quid pro quo.

£1.843m	Hosking core declared donations in this report's cleaned Reform/Brexit dataset
£4.0m	Delo donation to Reform UK in early 2026
£5,000	Hosking offer to Conservative candidates endorsing a four-point cultural pledge in 2024
ECHR	A policy objective explicitly promoted by Hosking and currently supported by Reform
First political activism	How Delo characterised his 2026 intervention

THE CENTRAL DISTINCTION

A donor saying "I am funding this party because I want these political ideas to succeed" is evidence of ideological motivation. It is not the same as saying "I will give you money if you adopt this policy." The first is ordinary political participation; the second may raise much stronger questions about conditional influence. This chapter keeps those categories separate.

1. Jeremy Hosking: A Long-Term Ideological Donor

Jeremy Hosking is a City financier whose political giving predates Reform UK. He was a major supporter of Brexit campaigning, gave approximately £1.7 million to Vote Leave according to contemporary reporting, supported the Conservatives and later became a significant donor to Nigel Farage's Brexit Party.

In May 2019 Hosking publicly confirmed a £200,000 donation to the Brexit Party and urged people seeking what he called a "proper conservative party" to support it. His explanation was explicitly ideological: he argued that the Conservatives were diluting Brexit and questioned whether they could be trusted on other issues if they were unwilling to pursue a robust Brexit position.

Our cleaned Electoral Commission analytical dataset attributes approximately £1.843 million in core Reform/Brexit donations to Hosking under the methodology used in this report. Historical media totals differ because published figures may include different periods, reporting categories or pre-poll records; the report therefore uses its reproducible cleaned figure for comparative analysis.

WHAT THIS ESTABLISHES

Hosking's giving is not politically neutral philanthropy. He has repeatedly explained his donations as a means of advancing a particular political project: Brexit, a more culturally conservative politics and related causes. That is lawful ideological participation and can be stated directly because Hosking himself has described his objectives.

2. From Brexit to the "Culture War"

Hosking's political priorities subsequently broadened beyond Brexit. He founded and funded the Reclaim Party and supported political campaigns centred on free speech and cultural issues.

By May 2024 he told the Guardian that he had stopped funding Reform because he regarded Reclaim as more willing to engage in "hand-to-hand combat" on culture-war and free-speech issues. That is important because it shows a donor willing to move financial support between political organisations depending on which vehicle he believed was advancing his preferred causes most effectively.

The position changed during the 2024 general election campaign. In June Hosking told the Financial Times that, "in despair", he had given £125,000 to Reform in support of its embrace of what he called the cultural crisis in Britain. The language is unusually explicit: Hosking himself linked the donation to Reform's political direction.

3. The Four-Point Cultural Pledge

Hosking's policy advocacy became even more concrete during the same campaign. The Financial Times reported that he offered £5,000 to Conservative candidates willing to sign a four-point cultural commitment associated with Reclaim.

One of those commitments was withdrawal from the European Convention on Human Rights. The Financial Times reported that Reform supported the pledge.

Reform UK's current published immigration programme explicitly states that a Reform government would leave the ECHR. This creates a clear example of donor-policy alignment in which the donor's desired objective and the party's programme can both be documented.

EVIDENCE CHECK

Established: Hosking publicly promoted ECHR withdrawal, offered funding to candidates supporting a programme containing that objective, and financially supported Reform while praising its cultural positioning. Reform currently advocates leaving the ECHR.

Not established: that Reform adopted ECHR withdrawal because Hosking paid for it. The policy has wider ideological roots and there is no evidence identified here of a conditional agreement between Hosking and Reform.

Area	Documented Evidence	Assessment
Brexit	Major Vote Leave and Brexit Party support	Directly documented ideological objective
Culture / free speech	Reclaim funding and public statements	Directly documented ideological objective
Leave the ECHR	Four-point pledge offered to Tory candidates	Specific policy objective documented
Reform support	£125k resumed donation during 2024 campaign	Donor explicitly linked donation to Reform's cultural positioning
Evidence of quid pro quo	None identified	No evidence that Reform exchanged policy for funding

4. Ben Delo: A First-Time Political Intervention

Ben Delo presents a different donor profile. He is a British technology entrepreneur and co-founder of cryptocurrency exchange BitMEX. In early 2026 he donated £4 million to Reform UK, making him one of the largest individual donors in the party's recent fundraising surge.

Delo publicly described the intervention as the first time in his life that he had become politically active. Writing about his reasons, he argued that entrenched elites and what he regarded as a wider regime of political nonsense posed a serious threat to the United Kingdom. He said the £4 million was intended to help Nigel Farage build Reform into a genuine alternative party of government.

That explanation is important because it provides direct evidence of motive. The available public evidence points to a broad ideological intervention rather than a donor who has publicly said he wanted a narrow commercial concession.

5. Relevant Background: BitMEX and the 2025 Pardon

Delo's business background is relevant because Reform's policy programme is unusually favourable towards cryptocurrency. It is also necessary to describe his regulatory history accurately.

Delo pleaded guilty in the United States in 2022 to failing to implement a Bank Secrecy Act-compliant anti-money-laundering programme at BitMEX and was sentenced to 30 months' probation. In March 2025 President Donald Trump granted Delo a full pardon. The US Department of Justice clemency register records the offence as a violation of the Bank Secrecy Act and the sentence as 30 months' probation.

This history is included as relevant background to a major donor operating in a heavily regulated financial sector. It should not be used to imply that his Reform donation was unlawful or that his past offence establishes improper conduct in British politics.

6. Cryptocurrency: Strong Sector Alignment, Weak Evidence of Causation

Delo's £4 million donation arrived during a period in which cryptocurrency investors were becoming exceptionally important to Reform's finances. Reuters reported that Harborne and Delo together supplied £7 million of Reform's private donations in the first quarter of 2026.

Reform's programme includes proposals to make Britain a cryptocurrency hub, reduce the tax burden on cryptoassets and create a digital-finance framework. Delo's wealth derives from the cryptocurrency industry, so the commercial-policy overlap is obvious.

However, overlap is not evidence of causation. Delo's published explanation for donating focused on national politics, elites and free speech rather than presenting a demand for specific cryptocurrency policy. No evidence identified by this report shows that his £4 million was conditional upon Reform adopting or maintaining any crypto proposal.

WHY THIS MATTERS

A sector can become politically influential without any explicit purchase of policy. If a party becomes heavily financed by individuals who share commercial exposure to one sector, voters may reasonably ask whether that sector enjoys unusual access or agenda-setting power. The appropriate response is to investigate meetings, advisory roles, policy-development channels and donor communications — not to infer corruption from occupational background alone.

7. Two Donors, Two Forms of Ideological Money

Dimension	Jeremy Hosking	Ben Delo
Primary public motive	Explicit cultural/Brexit policy agenda	Broad political change; anti-elite and free-speech themes
Specific policy advocacy	Yes — including ECHR withdrawal	No specific donation condition identified
Commercial-policy overlap	Finance/investment; less central to documented motive	Strong — cryptocurrency
Formal Reform role	None identified	None identified
Evidence of transactional influence	None identified	None identified
Evidence of ideological influence	Strong, by donor's own statements	Strong, by donor's own statements

8. The Influence Spectrum

A USEFUL WAY TO READ DONOR EVIDENCE

Political influence exists on a spectrum:

1. Passive support — donor gives because they generally like a party.
2. Ideological support — donor funds a movement to advance openly stated political values.
3. Policy advocacy — donor publicly promotes identifiable policies also supported by the recipient.
4. Access and agenda setting — evidence shows donor has privileged opportunities to shape discussion.
5. Conditional funding — evidence shows money was contingent on a political action or policy.
6. Quid pro quo — evidence shows a decision or benefit was exchanged for money.

The evidence examined here places Hosking clearly within ideological support and policy advocacy. Delo is clearly an ideological supporter with a strong commercial-policy overlap. The evidence presently does not place either donor in the final two categories.

Key Findings

- Jeremy Hosking has a long record of explicitly ideological political giving spanning Brexit, the Conservative Party, Reclaim and Reform UK.
- Hosking publicly linked renewed Reform funding in 2024 to its handling of what he called Britain's cultural crisis.
- He separately offered money to Conservative candidates willing to support a four-point cultural pledge that included withdrawal from the ECHR; Reform currently advocates leaving the ECHR.
- This is strong evidence of policy-motivated political giving, but not evidence that Reform sold or changed policy in exchange for his money.
- Ben Delo gave Reform UK £4 million in early 2026 and publicly described it as his first political activism, motivated by a broad critique of the political establishment and concern about Britain's direction.
- Delo's cryptocurrency background creates a substantial sector-policy overlap with Reform's crypto-friendly programme.
- No evidence identified by this report demonstrates that Delo conditioned his donation on cryptocurrency policy or that Reform adopted those policies because of his funding.
- The two donors show why ideological influence should not be confused with corruption: wealthy individuals may lawfully finance political movements precisely because they want particular ideas to become politically successful.

WHAT THE EVIDENCE DOES NOT SHOW

This chapter does not establish that Jeremy Hosking or Ben Delo purchased Reform UK policy, exercised improper control over the party, received a governmental favour in return for donations, or entered into a quid pro quo arrangement. No such evidence has been identified. Where donors have publicly stated political objectives, those objectives are reported as evidence of motive — not converted into allegations of corruption.

Questions for the Reader

- Should there be any limit on how much one individual may spend advancing an ideological programme through party donations?
- Is transparency sufficient where donors openly state that they are funding parties to advance specific policy objectives?
- Should meetings between major donors and policy teams be routinely disclosed?
- When a party receives large sums from a particular commercial sector, what safeguards would allow voters to distinguish shared ideology from sector influence?
- Where should democratic systems draw the line between legitimate advocacy and excessive financial power?

CURRENT STATUS

This chapter is not dependent on an unresolved regulatory investigation. It should nevertheless be updated if either donor assumes a formal Reform role, publicly describes further policy objectives, or evidence emerges of direct involvement in policy development. Last reviewed: 8 August 2026.

Political Funding, Influence and Transparency

3.3 Related-Party Finance: Richard Tice, Britain Means Business and TISUN

EVIDENCE SUMMARY

Purpose: Examine financing connected directly to Reform UK deputy leader Richard Tice, distinguish outside donations from related-party support, trace the relationship between Britain Means Business, TISUN Investments and Reform UK, and explain the current police scrutiny of 2024 transactions.

Evidence confidence: ★★★★★ company control and Electoral Commission records | ★★★★☆ transaction chronology reported by major news organisations | ★★★☆☆ interpretation of motive or purpose

Status: LIVE — Metropolitan Police scrutiny of relevant 2024 payments remains unresolved as of 8 August 2026.

Executive Brief

Richard Tice is not simply a Reform UK politician who has also donated to the party. Public records show that companies under his control have been part of Reform's financing architecture across several years.

Companies House records identify Tice as the active director of Britain Means Business Ltd and as its person with significant control, holding 75% or more of the voting rights. The company was originally incorporated as Leave Means Leave and changed its name to Britain Means Business in May 2020.

Tice is also the director of TISUN Investments Ltd. Electoral Commission records show numerous Reform UK entries attributed to TISUN, while Financial Times analysis found that approximately £613,000 recorded as donations in the first quarter of 2025 largely represented historic TISUN loans being converted into donations rather than new cash arriving at Reform.

The distinction matters. Britain Means Business and TISUN should not be presented as ordinary independent donors comparable with Christopher Harborne, Ben Delo or Jeremy Hosking. They are related-party entities controlled by a senior Reform figure.

The relationship became more significant during the 2024 general-election campaign. Reporting states that Fiona Cottrell transferred £1.075 million to Britain Means Business in June 2024. Britain Means Business then made two £250,000 donations to Reform UK. The Metropolitan Police are now examining those payments. No finding of wrongdoing has been made.

By the Numbers

75%+	Voting rights in Britain Means Business controlled by Richard Tice
£500,000	Two Britain Means Business donations to Reform before the 2024 election now under police scrutiny
£1.075m	Amount Fiona Cottrell reportedly transferred to Britain Means Business in June 2024
~£613,000	Historic TISUN loans reported as converted into donations in Q1 2025
£1.08m	Approximate historic Reform debt to TISUN described in FT reporting

1. Why "Related-Party Finance" Is the Correct Category

Political-finance analysis becomes misleading if every entity appearing in an Electoral Commission donor field is treated as an independent outside supporter.

Britain Means Business and TISUN Investments are controlled by Richard Tice, a former Reform leader and current deputy leader. Money attributed to those companies therefore tells us something different from a donation made by an unrelated individual.

This report classifies them as related-party finance: funding, lending or financial support provided through entities controlled by someone inside the party's senior leadership. That classification does not imply impropriety. It is intended to describe the relationship accurately.

METHODOLOGY NOTE

For donor-concentration analysis, this report will distinguish external donors from related-party entities. Both remain part of the political-finance record, but they answer different questions: one concerns outside financial dependence; the other concerns the extent to which insiders financed the organisation.

2. Britain Means Business: From Leave Means Leave to Reform Funding Vehicle

Companies House records show that Britain Means Business Ltd was incorporated on 1 August 2017 under the name Leave Means Leave. The company changed its name to Britain Means Business on 28 May 2020.

Richard Tice has been a director since incorporation. Companies House currently records him as the company's sole active director and as the active person with significant control, with ownership of 75% or more of the voting rights.

The company therefore cannot sensibly be described as an arm's-length donor independent of Reform's leadership.

The historical relationship is also important. Financial Times reporting found that Leave Means Leave provided almost £1 million to the Brexit Party/Reform political project around 2020, helping address a significant financial deficit after the 2019 election. The same corporate entity later operated under the Britain Means Business name.

ESTABLISHED FACT

Britain Means Business Ltd (company no. 10893794) is the same legal company previously named Leave Means Leave. Richard Tice is its active director and Companies House records him as controlling 75% or more of its voting rights.

3. TISUN Investments and Reform's Historic Loans

TISUN Investments Ltd is another Tice-linked company that appears repeatedly in Reform UK's political-finance records.

Electoral Commission records for the first quarter of 2025 contain numerous entries attributed to TISUN Investments. Taken at face value, these entries could be interpreted as a large burst of fresh fundraising.

Financial Times analysis, however, found that roughly £613,000 of Reform's headline donation figure for that quarter resulted from historic loans made by TISUN between 2021 and 2023 being converted into donations. No equivalent amount of new cash entered the party when those conversions were recorded.

This is not merely a technical distinction. A donation total that includes loan conversion does not measure new cash fundraising in the same way as a fresh bank transfer from an external supporter.

ACCOUNTING VERSUS CASH

A reported donation can represent a change in the legal/accounting status of an existing liability rather than new money arriving. For that reason, this report records TISUN loan conversions separately when discussing Reform's ability to raise fresh external cash.

4. The June 2024 Funding Chain

The most consequential transactions involving Britain Means Business occurred during the 2024 general-election campaign.

Period	Reported event
June 2024	Fiona Cottrell reportedly transfers £1.075m to Britain Means Business.
Campaign period	Britain Means Business makes two £250,000 donations to Reform UK.
Same-day flow reported by FT	£200,000 of Reform's TISUN-linked debt is repaid.
By April 2025	FT reports Reform had cleared its TISUN debt, primarily through reclassification/conversion rather than conventional cash repayment.
July 2026	Metropolitan Police confirm examination of the two £250,000 Britain Means Business payments.

The chain is important because the Electoral Commission record identifies Britain Means Business as the donor to Reform, while Tice has said the money paid into his company came from Fiona Cottrell. The public-facing political-finance record therefore does not by itself display the full upstream funding chronology described in subsequent reporting.

5. The Current Police Investigation

In July 2026 the Metropolitan Police confirmed that it was examining the two £250,000 donations made to Reform UK by Britain Means Business before the 2024 general election.

The investigation sits within wider scrutiny of Cottrell-linked political funding. Reporting states that police are examining whether relevant payments could have been intended to conceal a donation from an impermissible donor. No finding of wrongdoing has been made.

An investigation is not a finding of guilt. Britain Means Business was itself a UK-registered entity capable in principle of being a permissible donor. The legal question turns on the true source, purpose and control of the funds and whether statutory requirements were satisfied.

LIVE INVESTIGATION

The Metropolitan Police examination is unresolved. This report does not state that Britain Means Business, Richard Tice, Fiona Cottrell, George Cottrell or Reform UK committed an offence. It records the transactions, corporate relationships and existence of the investigation.

6. Why the Source of Funds Matters

UK political-finance law restricts political parties to donations from permissible sources. It is therefore important to establish the true donor where another person may in substance have provided money used for a political donation.

This does not mean that a company funded by another person is automatically an unlawful intermediary. Companies receive money from customers, investors, lenders and other sources every day. The legal analysis depends on the facts.

The public-interest issue is transparency: a reader looking only at the Electoral Commission entries for the two £250,000 payments would see Britain Means Business. Subsequent reporting adds another layer by identifying Fiona Cottrell as the source of a much larger payment into that Tice-controlled company during the election campaign.

7. Reform, Tice and the Alternative Explanation

Fair treatment requires the explanation offered by those involved to be recorded alongside the scrutiny.

Tice has publicly identified Fiona Cottrell as the person who provided the money to Britain Means Business. Reform has repeatedly said that it complies with Electoral Commission rules, and Tice has rejected suggestions of wrongdoing.

The TISUN loan conversions were reported to the Electoral Commission as donations. The issue for this report is therefore accurate interpretation of those figures when describing fresh fundraising, not an allegation that the conversions were hidden.

Likewise, the police investigation establishes scrutiny, not its outcome.

8. The Governance Question

The central governance concern is not that Tice used companies he controlled to support a political organisation he led. Political parties have often relied on founders, officers and wealthy supporters during their early development.

The more significant issue is that the same network combines several roles: senior party leadership, control of donor/fundraising entities, historic creditor status through TISUN, receipt of large third-party funds into Britain Means Business, and transfers onward to Reform during an election campaign.

That concentration of roles can make a technically compliant public record difficult for an ordinary voter to interpret without reconstructing company ownership, loan history and transaction chronology.

KEY QUESTION

Does the existing political-finance disclosure system give voters a sufficiently clear picture when money passes through an entity controlled by a senior party officer before reaching the party, particularly where the same officer or a related company is also a creditor of that party?

9. Evidence Assessment

Question	Assessment
Does Richard Tice control Britain Means Business?	Yes. Companies House records him as active director and as controlling 75% or more of voting rights.
Was Britain Means Business previously Leave Means Leave?	Yes. It is the same legal company, renamed in May 2020.
Is TISUN linked directly to Tice?	Yes. Tice is its director.
Did TISUN appear as a major Reform donor in Q1 2025?	Yes, but FT analysis found roughly £613,000 largely reflected conversion of historic loans rather than fresh cash.
Did Britain Means Business give Reform £500,000 before the 2024 election?	Yes — two £250,000 payments are now being examined by the Metropolitan Police.
Did Fiona Cottrell provide money to Britain Means Business?	Tice has said she did; FT reporting puts the June 2024 transfer at £1.075m.
Does this prove the company concealed an illegal donor?	No. No finding of wrongdoing has been made.
Should BMB and TISUN be counted as ordinary independent donors?	No for analytical purposes. Their control relationship with a senior Reform figure makes related-party classification more informative.

WHAT THE EVIDENCE DOES NOT SHOW

The evidence reviewed for this chapter does not establish that Richard Tice committed a political-finance offence; that Britain Means Business knowingly concealed an impermissible donor; that the TISUN loan conversions were unlawful; or that Reform's Electoral Commission returns were deliberately false. Those would require evidence beyond the corporate relationships and transaction chronology established here.

Key Findings

- Britain Means Business and TISUN Investments are related-party entities tied directly to Richard Tice and should be analysed separately from independent external donors.

- Britain Means Business is the same company formerly known as Leave Means Leave; Companies House records Tice as its active director and controlling 75% or more of voting rights.
- Approximately £613,000 recorded as TISUN donations in early 2025 largely reflected conversion of historic Reform loans rather than fresh fundraising, according to Financial Times analysis.
- Fiona Cottrell reportedly transferred £1.075m to Britain Means Business during the 2024 election campaign, after which the company made two £250,000 donations to Reform.
- The Metropolitan Police are examining those two £250,000 payments. No finding of wrongdoing has been made.
- The network demonstrates why headline donor tables can obscure the difference between independent outside funding, insider finance, loan conversion and money routed through a fundraising vehicle.

LIVE INVESTIGATION

This chapter must be reviewed whenever the Metropolitan Police, Electoral Commission, Parliament or a court publishes a material finding concerning the 2024 Britain Means Business/Cottrell transactions. Last reviewed: 8 August 2026.

Political Funding, Influence and Transparency

3.4 The Cottrell Network: Source of Funds, Access and the Criminal Investigation

EVIDENCE SUMMARY

Purpose: Separate the established facts from the allegations surrounding Fiona and George Cottrell; reconstruct the 2024 source-of-funds chronology; explain the applicable political-finance law; document George Cottrell's relationship with Nigel Farage and Reform UK; and record the present status of the Metropolitan Police investigation.

Evidence confidence: ★★★★★ Electoral Commission records and police status | ★★★★☆ reported bank-transfer chronology and documented access | ★★★☆☆ disputed questions of beneficial source, donor permissibility and political purpose

Status: LIVE CRIMINAL INVESTIGATION — no finding of wrongdoing has been made.

Executive Brief

The Cottrell network is the most legally sensitive funding issue examined in this report so far because it combines direct political donations, money moving through a Tice-controlled company, reported transfers from George Cottrell to his mother shortly before she donated, and an active police investigation under the Political Parties, Elections and Referendums Act 2000 (PPERA).

Electoral Commission records show Fiona Cottrell as a substantial Reform UK donor. Reporting in July 2026 added a crucial upstream layer: financial-industry sources told the Guardian that George Cottrell transferred a total of $2,047,693 to his mother in three tranches, each arriving approximately 24–72 hours before she made a political payment either directly to Reform or to Britain Means Business.

The reported sequence includes two transfers of $318,878 and $328,815 preceding Fiona Cottrell's two £250,000 Reform donations in May 2024, and a $1.4 million transfer preceding her £1.075 million payment to Britain Means Business on 10 June 2024. Britain Means Business subsequently transferred £500,000 to Reform.

The Metropolitan Police say their Special Enquiry Team is investigating alleged offences under section 61 PPERA following a February 2025 referral from the Electoral Commission. Police have sought early investigative advice from the Crown Prosecution Service. Two people have been interviewed under caution and no arrests have been made.

These facts create serious questions about the ultimate source and control of political funds. They do not establish that Fiona Cottrell acted as a proxy donor, that George Cottrell was impermissible, that Reform knowingly accepted an unlawful donation, or that any person committed an offence.

By the Numbers

$2,047,693	Total George-to-Fiona transfers reported by financial-industry sources
24–72 hours	Reported interval between each transfer and Fiona's subsequent political payment
£500,000	Two direct May 2024 Reform donations attributed publicly to Fiona Cottrell
£1.075m	June 2024 payment by Fiona to Britain Means Business
£500,000	Amount Britain Means Business subsequently transferred to Reform
2	People interviewed under caution; no arrests reported

1. Two Cottrells, Two Different Evidential Roles

The distinction between Fiona and George Cottrell is essential. The Electoral Commission record identifies Fiona as the donor for substantial payments to Reform. George's significance arises from reporting about the origin of money entering Fiona's account, his own financial support for Farage, and his long-standing proximity to Farage's political operations.

Fiona should therefore not be described as merely a front or conduit as a matter of established fact. That is one possible legal interpretation of the reported transactions and is precisely the kind of question investigators must determine.

Likewise, George should not be described as the true donor as an established conclusion. The evidence currently establishes reported transfers and timing; questions of ownership, intention, control and donor status remain unresolved.

LANGUAGE STANDARD

Throughout this chapter, "reported transfer" describes the bank-transfer chronology reported by reputable news organisations. "Donation" is used where a political payment appears in the Electoral Commission record. "Proxy", "conduit", "concealment" and "impermissible donor" are not treated as established descriptions unless an authoritative finding supports them.

2. The 2024 Transfer Sequence

Period	Amount	Reported flow	Political-finance context
May 2024	$318,878	George → Fiona	Reported 24–72 hours before a £250,000 Reform donation
May 2024	$328,815	George → Fiona	Reported 24–72 hours before a second £250,000 Reform donation
10 June 2024 (preceding transfer)	$1,400,000	George → Fiona	Reported before Fiona's £1.075m payment to Britain Means Business
June 2024	£1,075,000	Fiona → Britain Means Business	Payment to company controlled by Richard Tice
Election campaign 2024	£500,000	Britain Means Business → Reform	Two £250,000 payments

The Guardian reported that Fiona told bankers the incoming funds came from her son. It also reported that some funds passed through US-based cryptocurrency exchanges and money-exchange services before entering her account. Those routing details are relevant to tracing, but they do not by themselves demonstrate laundering or an unlawful political donation.

THE CENTRAL EVIDENTIAL FACT

The most significant new evidence is temporal and financial: three reported transfers from George Cottrell to Fiona Cottrell, totalling just over $2m, were each followed within approximately one to three days by political payments from Fiona. The legal significance of that pattern remains for investigators to determine.

3. What Section 61 PPERA Actually Covers

The Metropolitan Police have stated that their investigation concerns alleged offences under section 61 of the Political Parties, Elections and Referendums Act 2000.

Section 61 is aimed at evasion of the statutory restrictions on political donations. In substance, it criminalises knowingly entering into or furthering an arrangement that facilitates, or is likely to facilitate, donations to a registered party by someone other than a permissible donor through concealment, disguise or otherwise. It also addresses knowingly withholding material information or supplying materially false information to the party treasurer.

This makes the identity and status of the real donor central. It also explains why a payment can require investigation even where the name appearing in the Electoral Commission register is itself that of a permissible donor.

The Electoral Commission cannot investigate the section 61 offence itself. The Met says this is why the matter was referred to police.

LEGAL CAUTION

A rapid sequence of transfers does not automatically satisfy section 61. Investigators would need evidence relevant to matters such as who beneficially supplied the political funds, the donor's permissible status, the existence and purpose of any arrangement, and the knowledge of those participating. This report makes no finding on those elements.

4. The Police Investigation

The Metropolitan Police state that the investigation began in February 2025 following a referral from the Electoral Commission concerning donations made to a political party ahead of the 2024 general election.

Detectives from the Met's Special Enquiry Team are investigating alleged section 61 offences. Police have sought early investigative advice from the Crown Prosecution Service.

As of the latest public statement reviewed for this report, two people have been interviewed under caution and no arrests have been made. Reporting identifies George and Fiona Cottrell as having been interviewed under caution, but the police statement itself does not publicly name the two interviewees.

The two £250,000 payments made to Reform by Britain Means Business are also being examined by police, adding the Tice-controlled fundraising vehicle to the transaction chain described in Section 3.3.

CURRENT LEGAL STATUS

Investigation active. Two interviews under caution reported. No arrests. No charge. No conviction. No authoritative finding that any donation was unlawful.

5. George Cottrell: Relationship With Farage

George Cottrell's significance is not confined to the reported transfers to his mother. His relationship with Nigel Farage extends back to the UKIP and Brexit referendum period.

In 2016 Cottrell worked around Farage and UKIP's referendum operation. Contemporary reporting described him as having worked in Farage's office and as a familiar presence on the campaign. After his arrest, Farage described him as a young unpaid volunteer and party supporter.

By 2024 and afterwards, Cottrell was again visibly close to Farage. Reporting places him on the general-election campaign trail in Clacton, at numerous Reform events and fundraisers, backstage at rallies and on overseas travel with Farage.

Reform's formal position is that Cottrell is an unpaid volunteer with no formal role in the party. The party and Cottrell's lawyers have said a business card linking him to Farage's office was intended only to help donors and members of the public make contact and did not indicate formal authority.

FORMAL ROLE VERSUS PRACTICAL ACCESS

The evidence supports extensive access and recurring involvement around Farage. It does not presently establish that Cottrell held an official Reform post. For governance analysis, both facts matter: absence of formal title does not erase practical access, while practical access should not be inaccurately converted into a formal office.

An Unusual and Relevant Piece of Context: How to Launder Money

In February 2026 George Cottrell and financial-crime investigator Lawrence Burke Files published How to Launder Money: A Guide for Law Enforcement, Prosecutors and Policymakers. Biteback Publishing describes the book as an examination of money-laundering techniques intended to illuminate vulnerabilities for law enforcement and policymakers rather than to enable wrongdoing.

For this report, one chapter is unusually relevant. In "The Art of the Bribe", the authors examine mechanisms through which politicians and other targets can be influenced without an obvious cash payment. Financial Times reporting on the chapter records discussion of small gifts that may be explained as overenthusiastic friendship, maintaining long-term relationships with the person being influenced, and paying some of a target's expenses.

That material warrants inclusion because Cottrell has separately been reported to have provided Farage with accommodation, private security, staffing and other support, while Reform's explanation has emphasised that Cottrell is a personal friend and that relevant support was provided in a personal rather than political capacity.

The parallel is noteworthy. It is not evidence that those benefits were bribes. A book explaining how corrupt influence can operate does not establish that its author used those techniques, and Cottrell's lawyers have said the book was written to warn about bribery and corruption. They also say Cottrell has never profited, or expected to profit, from his support for Farage and that the two men are friends who share the same political ideology.

The relationship between the book and Reform is not remote: Nigel Farage and other senior Reform figures attended its London launch in February 2026. The publication is therefore relevant contextual evidence when assessing the unusual combination of friendship, financial support, political access and transparency questions surrounding the Cottrell–Farage relationship.

CONTEXT, NOT PROOF

Cottrell's authorship of a chapter explaining political bribery mechanisms is not evidence that he bribed Nigel Farage. Its relevance is narrower: the chapter discusses friendship, non-cash benefits and payment of expenses as possible influence mechanisms, while Cottrell has independently provided Farage with significant non-cash support. The similarity justifies scrutiny, not a conclusion of bribery.

6. Financial Support for Farage

Reform has acknowledged that Cottrell provided benefits to Farage before he became an MP, including accommodation and private security. Sunday Times reporting, subsequently summarised by other outlets, also described staffing and social-media support.

Farage registered a £9,253 benefit from Cottrell relating to a Belgium trip in April 2024 and later a £15,276 benefit for a US domestic flight provided in December 2024. Other earlier benefits were not registered.

Reform argues that the unregistered benefits were personal gifts provided when Farage was not an active politician and did not require parliamentary registration. Parliamentary rules can require registration of certain benefits received during the year before election if they relate to political activities, while purely personal gifts are exempt.

This creates a separate transparency question from the police donations inquiry. It should not be conflated with section 61: one concerns political-donation source restrictions; the other concerns parliamentary registration of interests.

7. The 2017 US Conviction: Relevant, but Easily Misused

George Cottrell has a prior US criminal conviction, but precision is particularly important here.

He was arrested in 2016 and originally faced 21 counts. Under a plea agreement, he ultimately pleaded guilty to one count of wire fraud; the other counts, including money-laundering-related allegations, were dismissed. In March 2017 he received an eight-month sentence with credit for time served.

The admitted conduct involved posing as someone willing to launder criminal proceeds while intending instead to retain the money. Court reporting also records that he provided information to US federal agents after his arrest.

It is therefore accurate to describe Cottrell as a convicted fraudster or as having a wire-fraud conviction. It would be inaccurate to say that he was convicted of money laundering.

His prior conviction is relevant background when assessing political judgment and public transparency. It is not evidence that the current Reform-related transactions were criminal.

PRECISION CHECK

Use: "convicted of wire fraud in the United States in 2017." Avoid: "convicted money launderer." The latter overstates the actual conviction and weakens the evidential discipline of the report.

8. Was George Cottrell a Permissible Donor?

This question is central but unresolved in the public evidence reviewed here.

The Guardian has questioned whether Cottrell was a permissible donor because he is resident in Montenegro. His lawyers have said that he is a permissible donor but, according to the newspaper, did not explain the basis on which that status was satisfied.

Residence abroad does not automatically make a British individual impermissible. The legal tests depend on the statutory donor categories and, for individuals, relevant electoral-registration status at the time of the donation.

Accordingly, this report does not state that Cottrell was impermissible. It records the disputed question because it is directly relevant to why the reported George-to-Fiona transfers could matter under section 61.

9. Allegation → Evidence → Response → Status

Allegation / question	Evidence	Response	Current status
Fiona was used to conceal George as the true donor.	Reported $2.047m George→Fiona transfers occurred 24–72 hours before her political payments; Fiona reportedly identified George as source of incoming funds.	George's lawyers have not accepted wrongdoing; Reform says donation rules were followed.	Under police investigation; not established.
George was an impermissible donor.	He is reported resident in Montenegro.	His lawyers say he was a permissible donor.	Unresolved publicly; residence alone is not determinative.
Cottrell had an undisclosed formal Reform role.	Frequent presence at events, access around Farage and disputed "chief of staff" presentation.	Reform and his lawyers say unpaid volunteer, no formal role.	Access established; formal office not established.
Farage received undeclared Cottrell support.	Accommodation/security/ staff support reported; some later travel benefits were registered.	Reform says earlier benefits were purely personal and outside registration requirements.	Separate transparency/standards question; not a section 61 finding.

Allegation / question	Evidence	Response	Current status
Britain Means Business concealed Fiona's funding.	Fiona reportedly paid £1.075m to BMB; BMB then gave £500k to Reform.	Tice says Fiona was a permissible donor and denies wrongdoing; Reform says it vets donations.	Transactions being examined by police.

10. What Reform and the Cottrells Say

Reform says it applies stringent donation vetting and follows Electoral Commission guidance and PPERA requirements. Richard Tice has said Fiona Cottrell is a permissible donor and has rejected suggestions of wrongdoing.

On Cottrell's role, Reform and his lawyers describe George as an unpaid volunteer with no formal party position.

On benefits provided to Farage, Reform has characterised relevant pre-election support as personal rather than political and says parliamentary rules were not broken.

George Cottrell's lawyers have said he is a permissible donor. When asked about the newly reported transfers to his mother, his lawyers told the Guardian that he had no further comment.

Those responses are part of the evidential record. They do not dispose of the questions under investigation, but nor should the existence of an investigation be presented as proof against them.

11. Evidence Assessment

Question	Assessment
Did Fiona Cottrell make substantial recorded donations to Reform?	Yes. Electoral Commission records establish direct donations, including £250,000 in February 2025 as well as 2024 giving reported elsewhere.
Did George transfer more than $2m to Fiona shortly before 2024 political payments?	Financial-industry sources reported three transfers totalling $2,047,693, each approximately 24–72 hours before a political payment.
Did Fiona identify George as the source of incoming money?	The Guardian reports that she did when questioned by bankers.

Question	Assessment
Is section 61 PPERA under criminal investigation?	Yes. The Met says its Special Enquiry Team is investigating alleged section 61 offences following an Electoral Commission referral.
Have people been arrested or charged?	No arrests have been reported; two people have been interviewed under caution.
Was George convicted of money laundering?	No. He pleaded guilty to wire fraud; other charges were dismissed.
Did George have substantial access to Farage?	Yes, documented presence, travel and financial support demonstrate extensive access.
Did he hold an official Reform role?	Reform says no; the evidence reviewed does not establish a formal appointment.
Does the transfer pattern prove Fiona was a proxy donor?	No. It creates a serious source-of-funds question but does not itself prove the legal elements.
Does this report conclude an offence occurred?	No.

WHAT THE EVIDENCE DOES NOT SHOW

The evidence reviewed does not establish that Fiona Cottrell knowingly acted as a proxy; that George Cottrell was legally impermissible at the relevant time; that Reform UK or Richard Tice knowingly participated in an arrangement to evade donation restrictions; that the reported use of cryptocurrency exchanges was itself suspicious or unlawful; or that George's 2017 conviction proves anything about the legality of the 2024 transactions.

The Central Transparency Problem

The Cottrell case illustrates a structural weakness in reading political-finance registers at face value. A register can accurately name the immediate legal donor while still leaving the public unable to see the upstream movement of funds that may be relevant to understanding who economically supplied them. That is why source-of-funds rules and section 61 exist.

"When a large political donation is preceded almost immediately by an equivalent transfer from another person, what evidence is necessary to establish whose donation it truly was?"

Key Findings

- Fiona Cottrell is a substantial recorded Reform donor and also provided £1.075m to the Tice-controlled Britain Means Business during the 2024 campaign.
- Financial-industry sources report that George Cottrell transferred $2,047,693 to Fiona in three tranches shortly before her 2024 political payments.
- The Metropolitan Police investigation began after an Electoral Commission referral and concerns alleged section 61 PPERA offences.
- Two people have been interviewed under caution; no arrests or charges have been reported.
- George Cottrell has extensive documented access to Nigel Farage and has provided him with financial benefits, although Reform says he has no formal party role.
- Cottrell was convicted of wire fraud in 2017; he was not convicted of money laundering.
- His lawyers say he was a permissible donor. That status has not been resolved publicly in the evidence reviewed.
- The transaction chronology justifies serious scrutiny but does not by itself prove concealment, proxy donation or criminal liability.

LIVE INVESTIGATION

This chapter requires immediate review if the Metropolitan Police, Crown Prosecution Service, Electoral Commission or a court announces a charging decision, closure, prosecution, acquittal, conviction or other material finding. Last reviewed: 8 August 2026.

Political Funding, Influence and Transparency

3.5 The Funding Architecture: What the Networks Show Together

EVIDENCE SUMMARY

Purpose: Synthesize the donor and related-party investigations in Sections 3.2–3.5; quantify the concentration of Reform UK funding; distinguish external donations, ideological finance, insider/related-party finance and personal benefits; and identify what the combined evidence does — and does not — establish.

Evidence confidence: ★★★★★ declared donations and company-control relationships | ★★★★☆ documented access, benefits and transaction chronology | ★★★☆☆ motive and possible influence | LIVE where police or parliamentary investigations remain unresolved.

Analytical principle: concentration, access and policy alignment are governance indicators. None is treated as proof of corruption without additional evidence.

Executive Brief

The individual chapters reveal a funding system that cannot be understood through a conventional donor league table alone.

Reform UK's financial network contains at least four materially different forms of support: very large external donations; explicitly ideological donations; related-party financing through entities controlled by senior party figures; and substantial personal benefits or gifts provided directly to political leaders.

The scale is unusually concentrated. This report's cleaned Electoral Commission dataset identifies approximately £45.29 million in core declared donations across the political continuity from the Brexit Party to Reform UK, of which approximately £25.19 million is attributable to Christopher Harborne alone — about 55.6%. Ben Delo's £4 million adds a further 8.8% of the same analytical total. Together, those two donors account for roughly 64.5%.

That concentration does not prove donor control. It does mean that Reform's headline fundraising strength is partly dependent on a small number of exceptionally wealthy individuals rather than being evenly distributed across a broad donor base.

At the same time, Britain Means Business and TISUN demonstrate why some apparent "donations" should be classified separately: they are entities controlled by Richard Tice, and some TISUN entries represent conversion of historic loans rather than fresh cash. The Cottrell transactions add a further question — not merely who appears as donor in the public register, but who economically supplied and controlled the money before it reached the registered donor.

The combined picture is therefore not “rich people fund Reform”. It is a layered architecture of external wealth, ideological sponsorship, insider finance, personal financial relationships and unresolved source-of-funds questions.

Corporate continuity note: the two Reform UK companies

References in this report to the “Brexit Party/Reform UK continuity” describe political-party continuity and should not be read as implying that a single Companies House entity has existed unchanged throughout the entire period.

The historic corporate vehicle was company no. 11694875, incorporated in November 2018 as The Brexit Party Limited and subsequently renamed Reform UK Party Limited. Companies House now records that company under the name Reform 2025 Ltd.

The current corporate vehicle is a different legal entity: Reform UK Party Limited, company no. 16260766, incorporated in February 2025. It is a private company limited by guarantee without share capital. The Electoral Commission separately registers Reform UK as a political party.

This distinction matters for the report’s longitudinal funding analysis. Donation records can legitimately be analysed across the political movement’s Brexit Party-to-Reform continuity, but corporate ownership, governance and liability questions must be tied to the correct company and time period.

CORPORATE PRECISION

Historic company: 11694875 (The Brexit Party Limited → Reform UK Party Limited → now Reform 2025 Ltd). Current company: 16260766 (Reform UK Party Limited), incorporated in 2025 and limited by guarantee without share capital. Party registration and company registration are related but legally distinct records.

1. The Architecture at a Glance

Network	Analytical category	Financial role	Principal governance issue
Christopher Harborne	Dominant external donor + personal benefactor	~£25.19m core declared party donations; separate £5m personal gift to Farage	Standards scrutiny of gift; crypto/aviation/defence policy intersections
Ben Delo	Major external ideological/sector donor	£4m	First political intervention; crypto-sector overlap; no quid pro quo identified

Network	Analytical category	Financial role	Principal governance issue
Jeremy Hosking	Explicit ideological donor	Substantial multi-year support	Publicly articulated political objectives including ECHR withdrawal
Britain Means Business	Related-party funding vehicle	2024 £500k to Reform among other support	Controlled by Richard Tice; upstream Fiona Cottrell funding under scrutiny
TISUN Investments	Related-party creditor/donor	~£613k Q1 2025 entries largely historic loan conversion	Controlled by Tice; illustrates accounting-vs-cash distinction
Fiona / George Cottrell	Donor + upstream source-of-funds network	Fiona direct donations and £1.075m to BMB; reported $2.047m George→Fiona transfers	Active Met investigation under section 61 PPERA; no finding of wrongdoing

THE CENTRAL FINDING

Reform's funding record is best understood as a network, not a list. The same public total can contain independent donations, insider-controlled entities, converted loans and money whose upstream source is now being examined by investigators.

2. Concentration: What 55.6% Actually Means

Harborne's approximate 55.6% share is one of the most important quantitative findings in this report, but it requires careful interpretation.

It does not mean Harborne owns 55.6% of Reform, controls 55.6% of its decisions or has purchased an equivalent share of political influence. Reform UK is a registered political party that also operates through a corporate structure. Its current party company, Reform UK Party Limited (company no. 16260766), is a private company limited by guarantee without share capital. Political donations therefore do not purchase equity in the company, and the percentage of party funding supplied by a donor is not equivalent to an ownership percentage.

What the figure measures is financial concentration within the cleaned dataset. More than half of the analysed core declared donation value is attributable to one person. Adding Delo's £4 million takes the combined share of those two donors to approximately 64.5%.

The democratic concern is resilience and dependency. A party whose finances are heavily concentrated among a handful of individuals may be more exposed to the preferences, withdrawal or continued support of those individuals than a party supported by a much broader funding base.

£45.29m	Approximate core declared donations in cleaned analytical dataset
£25.19m	Attributed to Christopher Harborne
55.6%	Harborne share
£4.00m	Ben Delo
64.5%	Approximate Harborne + Delo combined share

METHODOLOGY WARNING

These percentages describe the project's cleaned Electoral Commission dataset, not every pound Reform has ever received from every source. They should always be labelled as shares of the analysed core declared donation total.

3. Four Different Kinds of Political Money

Category	What it means	Examples	Question raised
A. External financial dependence	Large independent donors supply exceptional sums.	Harborne; Delo	Concentration, access and resilience.
B. Ideological sponsorship	Donors openly fund political projects because they want particular ideological change.	Hosking; Delo in broader terms	Legitimate participation versus disproportionate agenda-setting power.
C. Related-party finance	Senior insiders or their controlled entities lend, fund or recapitalise the party.	Tice; Britain Means Business; TISUN	Public totals can blur external fundraising and insider support.

Category	What it means	Examples	Question raised
D. Personal financial relationships	Benefits or gifts flow directly to political leaders rather than only to the party.	Harborne→Farage; Cottrell→Farage	Registration, dependency, access and conflict-of-interest safeguards.

4. Access, Money and Policy: The Evidence Ladder

The donor chapters also demonstrate why "influence" should not be treated as a binary concept.

A large donation is evidence of financial support. A meeting or friendship is evidence of access. A donor publicly advocating a policy is evidence of political preference. A party subsequently adopting a similar policy is evidence of alignment. None of those facts alone proves that money caused the policy.

The evidential threshold rises sharply when moving from alignment to causation.

Evidential level	Meaning	Position in this report
Level 1 — Funding	Money or benefits are documented.	Established across the networks examined.
Level 2 — Access	Personal meetings, travel, events or close relationships are documented.	Established particularly for Harborne and Cottrell.
Level 3 — Stated political objective	Donor explains what political change they support.	Strongest with Hosking; broader ideological statements from Delo.
Level 4 — Policy alignment	Party policy overlaps with donor interests/objectives.	Crypto, ECHR and other areas identified.
Level 5 — Evidence of influence	Evidence shows donor participated in shaping, lobbying for or securing policy.	Limited/partial testimony in some areas; not generally established.
Level 6 — Quid pro quo	Money or benefit is exchanged for a political decision.	No such arrangement established by evidence reviewed in this report.

WHY THIS MATTERS

Political debate often jumps directly from Level 1 to Level 6: "X donated, therefore X bought policy." That is analytically weak. This report instead asks how far up the evidential ladder each relationship can actually be supported.

5. The Public Register Does Not Always Tell the Whole Economic Story

The Tice and Cottrell chapters reveal a second structural issue: legal disclosure and economic understanding are not always the same thing.

The Electoral Commission register can accurately record the immediate donor while a reader remains unaware of the financing behind that donor. Britain Means Business illustrates the point. The public record identifies the company; subsequent reporting identifies a £1.075 million payment from Fiona Cottrell into that Tice-controlled entity during the 2024 campaign.

TISUN illustrates a different problem. A transaction recorded as a donation can represent conversion of an old loan rather than new cash. Counting it identically to a fresh external contribution can therefore exaggerate the amount of newly raised money.

The Cottrell investigation raises the most serious version of the upstream-source question. Reported transfers from George to Fiona shortly before Fiona's political payments are now relevant to a criminal investigation into alleged evasion of donation restrictions. The timing is evidence requiring explanation; it is not proof of an offence.

6. Personal Finance and Party Finance Intersect

Another recurring feature is the overlap between money given to Reform and money or benefits provided directly to its senior figures.

Harborne combines enormous party donations with a separate £5 million personal gift to Farage. Cottrell's relationship with Farage includes reported accommodation, security and other benefits as well as his family's connection to political donations. George Cottrell also provided a short-term loan to a Tice-linked company that attracted banking scrutiny, according to reporting.

These are legally distinct categories, and the report keeps them separate. Their coexistence is nevertheless important from a governance perspective because personal financial dependence can create transparency and conflict questions even where party-donation rules are not engaged.

GOVERNANCE PRINCIPLE

The absence of a proven quid pro quo does not make disclosure irrelevant. Transparency rules exist partly so that voters can assess relationships before corruption is proved — and often where no corruption exists at all.

7. Established Facts, Governance Concerns and Unresolved Questions

Status	What belongs here	Evidential position
Established	Harborne dominates the analysed declared funding total; Delo gave £4m; Tice controls BMB and TISUN; BMB funded Reform; Fiona Cottrell made political payments; personal benefits to Farage are documented.	High
Governance concern	Funding concentration; insider financing; overlapping personal and political financial relationships; limited visibility of upstream sources in public registers.	Analytical conclusion from established facts
Unresolved regulatory/legal question	Whether particular gifts required registration; true source/control of certain 2024 Cottrell/BMB funds; section 61 compliance.	Active or unresolved
Possible influence	Whether donor access or commercial/ideological interests affected policy development.	Varies; strongest evidence is alignment and some attributed testimony
Not established	Purchased policy, bribery, deliberate concealment by Reform leadership, criminal conspiracy or quid pro quo.	Unsupported on current evidence

8. A System Under Active Scrutiny

This synthesis is necessarily provisional because several relevant matters are live.

The Metropolitan Police investigation into Cottrell-linked donations remains active. Parliamentary standards scrutiny has concerned Farage's £5 million Harborne gift, and separate reporting in August 2026 confirms continuing scrutiny of Reform-linked financial transactions. The existence of suspicious activity reports or law-enforcement inquiries does not establish criminal conduct.

The Financial Times has also reported that Farage and Tice are suing the National Crime Agency over alleged leaks of confidential banking information. That dispute concerns the handling of financial intelligence and does not itself resolve the underlying political-finance questions.

For that reason, this chapter should function as a map of the evidence at a particular date rather than a final verdict.

EVIDENCE UPDATE PRINCIPLE
Any charging decision, closure notice, standards ruling, Electoral Commission finding or court judgment could materially alter this synthesis. Later developments should therefore be tested first against the underlying source record and then against the conclusions drawn from it.

9. What the Combined Evidence Supports

Reform UK has become capable of raising very large sums, including leading all UK parties in accepted donations in the first quarter of 2026. Electoral Commission figures show Reform accepted approximately £9.26 million in donations excluding public funds in that quarter.

That fundraising strength is real. It is also highly concentrated: Reuters reported that Harborne and Delo supplied the majority of Reform's Q1 2026 private fundraising, with £3 million from Harborne and £4 million from Delo.

Across the longer dataset used in this report, the pattern is broader but similar: a small number of wealthy supporters account for a very large share of declared value, while related-party entities and loan conversions complicate headline totals.

The defensible conclusion is therefore not that Reform is illegally financed. It is that its financial rise has been unusually dependent on a compact network of wealthy individuals and insider-linked entities whose relationships with the party deserve substantially more scrutiny than a headline quarterly fundraising total provides.

10. What the Combined Evidence Does Not Support

EVIDENTIAL BOUNDARY
The evidence reviewed does not establish that Reform UK is "owned" by Christopher Harborne; that donors collectively dictate party policy; that Richard Tice knowingly laundered political donations; that Fiona Cottrell knowingly acted as a proxy; that George Cottrell was necessarily an impermissible donor; that personal gifts to Farage were bribes; or that the party's funding architecture is itself criminal. Those propositions go materially beyond the established evidence.

The Central Democratic Question

The strongest conclusion from Part III is therefore institutional rather than criminal.

"Can voters meaningfully judge political independence when a party's finances combine extreme donor concentration, insider-controlled funding

vehicles, substantial personal benefits to leaders and transaction chains whose upstream sources are not always visible in the public register?”

That question does not presume wrongdoing. It asks whether the current disclosure system provides enough information for democratic accountability when political finance becomes structurally complex.

Key Findings

- Approximately 55.6% of the core declared donation value in this report’s cleaned dataset is attributable to Christopher Harborne.
- Harborne and Ben Delo together account for approximately 64.5% of the analysed total.
- Reform’s funding includes materially different categories that should not be collapsed into one donor ranking: external donations, ideological funding, related-party finance, loan conversions and personal benefits.
- Britain Means Business and TISUN are controlled by Richard Tice and are analytically different from independent external donors.
- The Cottrell investigation demonstrates why the immediate donor named in a register may not answer every legitimate source-of-funds question.
- Policy alignment is documented in several areas, but a quid pro quo has not been established.
- Active police and parliamentary scrutiny means parts of the funding picture remain provisional.
- The evidence supports a strong transparency and governance critique without requiring unsupported allegations of corruption.

PART III SYNTHESIS STATUS

Sections 3.2–3.6 now establish the working funding architecture. Before final publication, all live-investigation statements, donation totals and regulatory statuses should receive a final date-stamped source check. Last reviewed: 8 August 2026.

Political Funding, Influence and Transparency

3.6 Evidence Audit and Visual Funding Map

AUDIT RESULT

Part III has now been reconciled against the project master funding workbook and refreshed against current primary or high-authority sources where the relevant issue is live. The principal concentration figures used in Section 3.6 reproduce the workbook values: £45.292641m core declared donations, £25.19m attributable to Christopher Harborne (55.616%), and £4m attributable to Ben Delo, taking their combined share to 64.448%. Corporate continuity has also been checked against Companies House.

Audit status: PASS WITH LIVE-MATTER FLAGS. No arithmetic correction is required to the principal Part III concentration findings. Live police, parliamentary and litigation matters must remain date-stamped and provisional.

1. Reconciled Funding Metrics

Metric	Audited value	Workbook source	Treatment
Core declared donations	£45,292,641.02	Master workbook Dashboard	Reconciled
Unique donor entities	134	Master workbook Dashboard	Reconciled
Harborne core donations	£25,190,000	Donor Summary	Reconciled
Harborne share	55.616%	Donor Summary	Reconciled
Delo core donations	£4,000,000	Donor Summary	Reconciled
Harborne + Delo share	64.448%	Donor Summary cumulative share	Reconciled
Top five donor share	75.151%	Dashboard	Reconciled

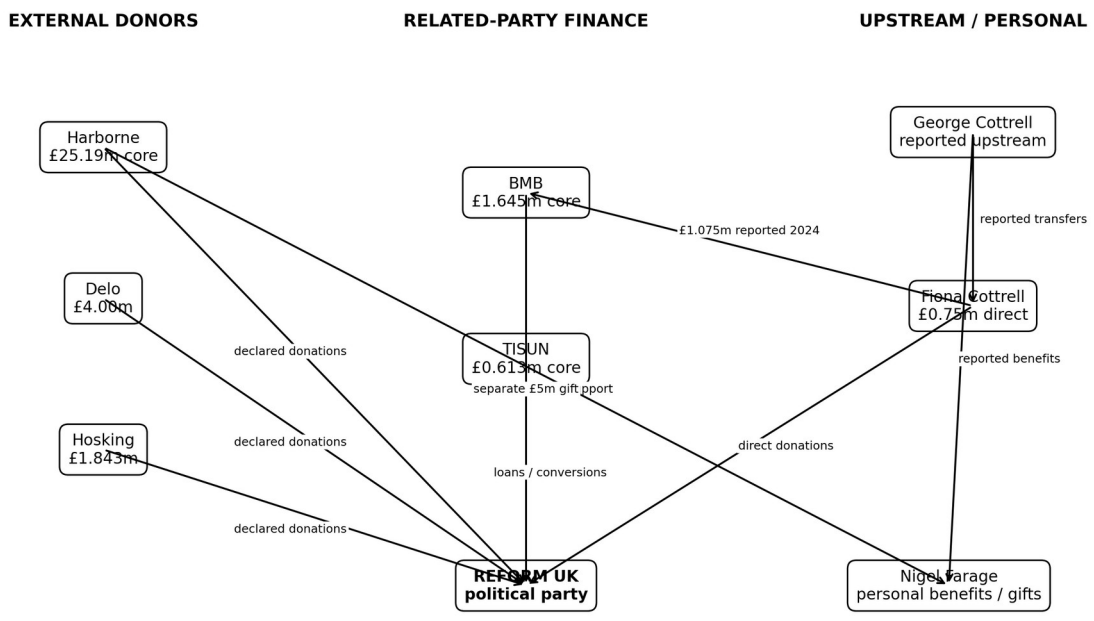
Metric	Audited value	Workbook source	Treatment
Top ten donor share	82.411%	Dashboard	Reconciled
Britain Means Business core total	£1,644,919.17	Donor Summary	Related-party; do not treat as arm's-length donor
TISUN core total	£613,000	Donor Summary	Related-party; 2025 amount substantially loan conversion

INTERPRETATION RULE

The £45.29m denominator is the report's cleaned analytical dataset, not a claim about every receipt ever obtained by the party. Related-party entities remain in the dataset because they are declared political-finance records, but the prose analysis identifies them separately so that external donor dependence is not confused with insider finance.

2. Visual Funding Map

The diagram below converts the preceding donor chapters into a single evidence map. It deliberately separates declared party donations from related-party support and personal/upstream financial relationships.



Core figures: project cleaned Electoral Commission dataset. "Reported" arrows are contextual evidence, not findings of wrongdoing.

Figure 3.1 — Reform UK funding architecture examined in Part III. Core totals are derived from the cleaned Electoral Commission dataset; upstream and personal-benefit arrows are separately labelled.

3. Corporate Continuity Audit

Companies House confirms that company no. 11694875 is the historic corporate vehicle: incorporated on 23 November 2018, previously named The Brexit Party Limited and then Reform UK Party Limited, and now named Reform 2025 Ltd.

Companies House also confirms that the current Reform UK Party Limited is company no. 16260766, incorporated on 18 February 2025 as a private company limited by guarantee without share capital.

The current company is now recorded as the person with significant control of the historic company, holding 75% or more of its shares and voting rights and the right to appoint or remove directors. Nigel Farage and Richard Tice ceased to be individually registered as persons with significant control of the historic company on 19 February 2025.

Accordingly, references elsewhere in this report to the Brexit Party → Reform UK "continuity" are political and historical unless a specific company number is supplied. Corporate-law claims must use the correct entity for the relevant date.

CORPORATE AUDIT — PASS

The correction introduced in v1.0.1 is retained. No section should describe Harborne's donation share as an equity or ownership share. The current party company has no share capital; donor concentration measures financial dependence, not corporate ownership.

4. Live-Matter Audit

Matter	Audit position	Required wording
Cottrell / section 61 PPERA	Metropolitan Police investigation remains active; reporting says two people have been interviewed under caution and no arrests have been reported.	LIVE — retain "no finding of wrongdoing" language.
BMB / TISUN 2024 flows	FT reported Fiona Cottrell's £1.075m payment to BMB, same-day Reform funding and TISUN-linked repayment/conversion chronology.	LIVE / disputed interpretation — describe transactions, not criminal conclusion.

Matter	Audit position	Required wording
Harborne + Delo Q1 2026	Reuters reported £3m+ from Harborne and £4m from Delo within Reform's roughly £9.3m quarterly fundraising.	CONFIRMED contemporary context; separate from long-run dataset.
Harborne £5m personal gift	Separate from party-donation dataset and subject to standards/transparency scrutiny described earlier in report.	LIVE — never add £5m to party-donation concentration denominator.
NCA litigation / alleged leaks	Separate procedural dispute concerning handling of financial intelligence.	LIVE — does not prove or disprove underlying finance allegations.

5. Classification Audit

- Christopher Harborne — retain as dominant external donor and separate personal benefactor. His £5m personal gift to Farage must not be merged into party donation totals.
- Ben Delo — retain as external major donor with explicit ideological rationale and crypto-sector overlap. No evidence of purchased policy has been identified.
- Jeremy Hosking — retain as external ideological donor. His public statements make policy-motivated giving unusually well evidenced, but transactional influence is not established.
- Britain Means Business and TISUN — retain as related-party entities because of Richard Tice's control. They may appear in declared donation totals but should not be rhetorically presented as independent outside donors.
- Fiona Cottrell — retain as recorded external donor whose source-of-funds chronology is under investigation. George Cottrell should not be inserted into the declared donor ranking merely because upstream transfers have been reported.
- Personal benefits to Farage — retain in a separate evidential category from party donations.

6. Claims Requiring Publication-Day Recheck

- Metropolitan Police status and whether any arrest, charge, closure or referral decision has occurred.
- Any Parliamentary Commissioner for Standards finding concerning Farage's £5m Harborne gift or Cottrell-related benefits.
- Any Electoral Commission statement or enforcement decision concerning the Cottrell/Britain Means Business transactions.
- Any judgment or material procedural ruling in Farage/Tice litigation concerning alleged NCA leaks.
- Companies House names, status and control records for company nos. 11694875, 16260766, 10893794 and relevant TISUN entities.

- Electoral Commission donation totals if the report's dataset is extended beyond its present cut-off.

EDITORIAL LOCK

Subject to those live-matter updates, the quantitative and classification framework of Part III can now be treated as locked. Future changes should be made only where a new primary record, official decision or clearly material evidential development requires them.

Tier	Sources	Use in report
Tier 1 — Primary	Electoral Commission; Companies House; legislation; police/CPS/Parliamentary statements; court records.	Use for legal status, company identity, declared donations and formal decisions.
Tier 2 — High-authority reporting	Reuters, Financial Times and equivalent reporting based on documents or named/clearly described sources.	Use for transaction reconstruction and contemporaneous context; attribute where evidence is not public.
Tier 3 — Investigative reporting	Guardian/Sunday Times and other reputable investigations.	Use for reported upstream transfers, access and benefits; preserve attribution and responses.
Tier 4 — Commentary / inference	Political claims, social posts, partisan commentary.	Do not use to establish facts unless independently corroborated.

Part III Audit Conclusion

The audit does not materially weaken the Part III thesis. It sharpens it. Reform's fundraising strength is genuine, but the long-run value captured in the project dataset is highly concentrated; some large entries represent related-party support rather than arm's-length fundraising; some apparent donation growth reflects conversion of historic loans; and some politically important financial relationships sit outside party donation totals altogether.

The defensible conclusion remains one of transparency and governance rather than presumed criminality: the party's financial architecture is unusually concentrated and structurally complex, and several of its most consequential relationships require a reader to look beyond a headline donor register to understand the economic and personal relationships surrounding the money.

Audit Source Register

- Project Master Funding Evidence Workbook v3 — Dashboard, Donor Summary and Donor Research sheets.
- Companies House — Reform 2025 Ltd, company no. 11694875: overview, filing history and persons with significant control.
- Companies House — Reform UK Party Limited, company no. 16260766: overview and persons with significant control.
- Reuters, 4 June 2026 — Reform Q1 fundraising and Harborne/Delo contributions.
- Financial Times, August 2026 — Fiona Cottrell/Britain Means Business/TISUN transaction chronology.
- The Guardian, July–August 2026 — Cottrell transfer chronology and police-investigation reporting.

SOURCE NOTE — Detailed Part III source registers and research-audit material are available in the Evidence & Sources Compendium. Core evidence, calculations and substantive findings remain in the main report.

PART IV

Power Inside Reform: Governance, Membership and Leadership Control

PART IV EVIDENTIAL STANDARD — Formal constitutional powers, observed organisational practice, councillor conduct and council performance are separate tests. Evidence in one category is not treated as proof of another. The Part IV scorecard consolidates the overall assessment; individual sections therefore need establish only the evidence unique to their test.

4.1 Democratised — But How Democratic?

EVIDENCE SUMMARY

Purpose: Examine Reform UK's post-2024 claim to have transferred control from a shareholder-led party to its members; map the formal powers of members, the Party Board, Chairman and Leader; and distinguish genuine democratisation from continuing centralisation of executive authority.

Primary evidence: Reform UK Constitution; Companies House; Reform UK's own board-election rules and current website. Secondary evidence is used for contemporaneous explanations and criticism.

Assessment: The 2025 reforms introduced real member rights and ended the old shareholder model. They did not create a member-sovereign party. The constitution continues to place unusually extensive operational and political authority in the Leader and Board.

Executive Brief

Reform UK unquestionably became more internally democratic in 2025. The previous shareholder structure was replaced by a company limited by guarantee without share capital; members gained three directly elected places on the Party Board; contested leadership elections are decided by eligible members; and a constitutional route now exists for members to trigger a no-confidence process.

Those changes are substantive. Describing Reform as simply "a private company owned by Nigel Farage" is now out of date.

However, "members now control the party" is also too simple. The constitution gives members only those ballots the Board decides to provide, makes conference policy motions advisory, requires an exceptionally high threshold before members can initiate a leadership no-confidence process, and gives the Party Leader significant appointment and executive powers.

Most strikingly, Article 6.20 delegates all powers of the Board to the Party Leader between Board meetings, subject to later ratification. The Board is constitutionally required to meet in person only twice a year. The Leader also appoints three Board members and key officers, gives political direction, develops policy with Board agreement, and makes or approves national policy statements.

The result is a hybrid model: more democratic than the Brexit Party/Reform structure it replaced, but still strongly leader-centred.

1. What Changed in February 2025

The democratisation claim arose from a genuine structural change. Reform announced in February 2025 that Farage had relinquished the old majority-shareholder model and that the party would operate through a non-profit company limited by guarantee without share capital.

Companies House now records the current Reform UK Party Limited as company no. 16260766, incorporated on 18 February 2025 and limited by guarantee without share capital. As established in Part III, it is legally distinct from the historic corporate vehicle, company no. 11694875.

The new constitution also introduced a Party Board containing elected members and formalised member ballots for the leadership. These reforms materially reduced the direct proprietary control that had characterised the earlier structure.

ESTABLISHED CHANGE

The old criticism that Reform is merely a share company personally owned by Farage is no longer an accurate description of the current structure. The relevant question in 2026 is not who owns shares — the current company has none — but who possesses constitutional decision-making power.

2. What Members Actually Receive

Member power	Exists?	Constitutional limitation
Leadership ballot	Yes, when a contested leadership election is triggered.	Eligible voters must have been members in good standing for at least 180 days before the election is called.
Board representation	Yes.	Three Board members are elected in a party-wide ballot.
Conference policy votes	Yes.	Carried motions are advisory only and must be listed for Board discussion within three months.
Other internal ballots	Potentially.	Article 4.3 says members vote in internal elections or ballots that the Board decides, in its absolute discretion, to hold.
Call an EGM	Yes, formally.	Requires written requests from at least 50% of all members in good standing.

Member power	Exists?	Constitutional limitation
Trigger leader no-confidence process	Yes, formally.	Requires 50% of all members in good standing writing to the Chairman; requests expire after 60 days.
Direct control of manifesto/policy	No.	The Board approves policies and manifestos; the Leader directs policy development with Board agreement.

3. The Board: Mixed Representation, Mixed Control

The Party Board is the constitution's principal management and administrative authority. It manages funds, structure and employees, approves policies and manifestos, oversees discipline and creates procedural rules.

Its normal voting composition is deliberately mixed: three members elected by the membership; three members appointed by the Party Leader; the Party Leader himself; and the Party Chairman.

This gives members a meaningful elected bloc, but not an elected majority. The Leader directly appoints three Board members and appoints the Chairman, subject to Board approval. The Leader also appoints the Treasurer, Secretary, Chairman and Deputy Leader from eligible members.

In August 2025 Reform held its first party-wide election for the three elected Board seats. Its published rules used first-past-the-post voting and an independent third-party online platform. Darren Grimes, Gawain Towler and Dan Barker were reported elected after 67,255 members participated.

That election is important evidence against the proposition that Reform has no internal democracy. The stronger criticism is narrower: member democracy exists inside a governance structure in which appointed and leader-held positions remain powerful.

BALANCE OF THE BOARD

Three Board seats are elected by members; three are appointed by the Leader; the Leader sits automatically; and the Chairman — himself appointed through the leadership structure — also sits on the Board. Member representation is therefore real, but it does not amount to straightforward member control of the principal governing body.

4. Article 6.20: The Most Important Clause

For understanding day-to-day authority, Article 6.20 is arguably the most consequential provision in the constitution.

ARTICLE 6.20 — EFFECT

Between Board meetings, all powers of the Board are delegated to the Party Leader, who may exercise them at his discretion. Decisions that would otherwise have been Board decisions are subsequently subject to ratification by the Board.

This provision matters because the Board's powers are extensive: management of party funds and structure, policy and manifesto approval, discipline and procedural rule-making all sit within its constitutional remit.

The constitution requires the Board to meet in person at least twice a year. It may of course meet more frequently, and five voting members can requisition an emergency meeting. Nevertheless, the default constitutional mechanism between meetings is delegation to the Leader.

That does not make the Board meaningless: ratification is required and the Board retains formal authority. But it creates a structure in which executive initiative is highly concentrated in the Leader rather than requiring prior collective approval for every Board-level decision.

5. The Leader's Constitutional Powers

Area	Leader's constitutional role
Political direction	Leader gives political direction and develops policy with Board agreement.
National statements	Leader makes or approves national statements of party policy and how they are communicated.
Board appointments	Leader appoints three ordinary Board members.
Senior officers	Leader appoints Treasurer, Secretary, Chairman and Deputy Leader under the constitution, with specified Board involvement where applicable.
Advisory groups	Leader may create advisory groups at his discretion.
Other appointments	Leader may make other appointments and inform the Board at its next meeting.

Area	Leader's constitutional role
Between meetings	All Board powers are delegated to Leader under Article 6.20, subject to ratification.
By-election candidates	For parliamentary and other non-local by-elections, selection is made by the Leader in consultation with the constituency association or branch.

6. Can Members Remove the Leader?

Yes — but the trigger threshold is extraordinary.

Article 6.28 allows a no-confidence motion to be initiated by 50% of all members in good standing writing to the Chairman. Each request remains valid for only 60 days. Only after the requisite number is reached does the Chairman convene the Board to consider the no-confidence motion.

The parliamentary route is unavailable until Reform has more than 100 MPs. At that point it requires 50 MPs or 50% of the Parliamentary Party, whichever is greater.

The current Reform website claims more than 270,000 members. If every one were in good standing, a member-led trigger would therefore require written requests from more than 135,000 members within the relevant 60-day validity window. The exact real threshold depends on the party's number of members in good standing at the time.

Importantly, the members do not themselves remove the Leader through this mechanism. They trigger a Board meeting. The Leader is deemed to have resigned only if the Board then passes the motion of no confidence.

DEMOCRATIC RIGHT OR PRACTICAL BARRIER?

The constitution provides a genuine mechanism for members to challenge the Leader, but a 50% written-petition threshold is so demanding that the existence of the mechanism should not be confused with easy or routine accountability. The final no-confidence decision is made by the Board, not directly by the membership.

7. Conference: A Voice, Not Sovereignty

The annual conference doubles as the party's AGM and can consider motions on policy and strategy.

However, Article 5.3 explicitly gives successful conference motions advisory force only. The Board must list a carried motion for discussion within three months, but the constitution does not require the Board to adopt it.

This is a significant distinction when assessing the claim that members "own" or "control" the party. Members can express policy preferences through conference, but final policy and manifesto authority remains with the Board, while national policy communication is controlled by the Leader.

8. Local Branches and Candidate Control

The constitution provides for branches and constituency associations, but their existence and operation remain subject to central authority. The Board may establish, suspend or disband branches and makes rules concerning their structure and operation.

Candidate selection is also centrally regulated. The Board controls the approved list and may make rules governing selection, training, nomination, ranking, conduct and removal. The Chairman can suspend a candidate who may damage the party's reputation or interests, subject to subsequent Board determination and appeal procedures.

For parliamentary by-elections, the constitution gives the Party Leader the selection decision in consultation with the local association or branch. Local-government by-elections are ordinarily the responsibility of local associations or branches, although the Chairman can refer a selection to the Board.

These arrangements provide local participation but preserve substantial central control over the party brand and candidature.

9. The Chairman: Another Concentration Point

The Chairman is not merely a ceremonial officer. The constitution gives the office significant organisational, membership and disciplinary authority.

The Chairman can refuse new membership, refuse renewals, revoke membership in specified circumstances, exercise emergency disciplinary powers in cases of exceptional gravity and urgency, suspend candidates, oversee the membership database and exercise overall responsibility for party organisation.

There are appeal and review mechanisms around several of these powers. Nevertheless, because the Leader appoints the Chairman within the constitutional process, the office forms another important link between leadership appointment and organisational control.

Reform's current website identifies Lee Anderson as Chairman. The constitution's allocation of powers attaches to the office, irrespective of which individual occupies it.

10. An Administrative Anomaly: The Constitution Still Names the Old Company

The official constitution currently available online contains a corporate reference that has been overtaken by the February 2025 restructuring.

Article 2.3 states that the Party exists as a limited liability company registered at Companies House under number 11694875. As established in Part III, that number now belongs to Reform 2025 Ltd, the historic corporate vehicle. The current Reform UK Party Limited is company no. 16260766.

This does not by itself invalidate the constitution or establish any wrongdoing. It does, however, demonstrate why political-party governance documents need to be read alongside current Companies House records rather than treated as self-updating statements of corporate fact.

For this report, the discrepancy is recorded as a governance/document-control issue requiring clarification or constitutional updating by the party.

DOCUMENT-CONTROL FINDING

The constitution available from Reform's own web infrastructure still identifies company no. 11694875 as "the Party", while current Companies House records identify Reform UK Party Limited as company no. 16260766. The report treats Companies House as authoritative for current corporate identity.

11. The Claim of "Member Ownership"

Political rhetoric around "ownership" needs particular care because the current company has no share capital. Members do not collectively hold transferable equity in Reform UK Party Limited in the ordinary company-law sense.

The party's February 2025 statement used "handed over ownership" to describe democratisation, non-profit status and the new constitutional arrangements. In practical democratic terms, the reforms gave members new rights; in corporate terms, the absence of shareholders means "ownership" is better understood as political language than as a literal division of equity among 270,000 members.

The meaningful test is therefore not who "owns" Reform, but who can elect, appoint, direct, veto, remove and bind its decision-making institutions.

12. Evidence Assessment

Question	Assessment
Did Reform genuinely democratise its structure in 2025?	Yes. It ended the shareholder model and introduced elected Board seats and formal member leadership ballots.
Do members elect the Party Board?	Partly. Three seats are elected; three are Leader-appointed, while the Leader and Chairman also sit on the Board.
Can members vote on policy?	At conference, yes, but successful motions are advisory rather than binding.
Can members remove Farage or a future leader?	They can trigger a no-confidence process, but only after 50% of all members in good standing submit written requests; the Board then decides the motion.

Question	Assessment
Does the Leader control policy alone?	No. Policy development and approval formally involve the Board. The Leader nevertheless has substantial direction, communication and delegated executive powers.
Does Article 6.20 delegate Board powers to the Leader?	Yes, between Board meetings, subject to subsequent ratification.
Are local branches autonomous?	No. They operate within Board-made rules and can be established, suspended or disbanded by the Board.
Is Reform still “owned by Farage”?	Not in the old shareholder sense. That description is obsolete for the current company.
Does the constitution currently identify the correct company number?	No. The published constitution still cites 11694875; current Reform UK Party Limited is 16260766.
Does the evidence justify calling Reform a dictatorship?	No. The structure contains genuine elections, collective bodies and appeal mechanisms. “Strongly leader-centred” is the more defensible description.

WHAT THE EVIDENCE DOES NOT SHOW

The evidence does not support saying that Reform has no internal democracy, that members possess no meaningful rights, that Farage personally owns the current party company, or that every Board decision is dictated by the Leader. Equally, the 2025 reforms do not support an unqualified claim that members now exercise sovereign control. The constitutional reality lies between those two descriptions.

The Central Governance Question

The transition from shareholder control to constitutional membership was real. The remaining question is whether the distribution of authority matches the democratic language used to describe it.

“If members can elect only part of the governing board, conference votes are advisory, half the entire membership is required merely to trigger a

leadership challenge, and all Board powers pass to the Leader between meetings, where does ultimate practical control sit?"

Key Findings

- Reform's 2025 democratisation was substantive and the old shareholder-ownership criticism is now outdated.
- Members directly elect three Board representatives and can vote in contested leadership elections.
- Members do not elect a majority of the normal Board composition.
- Conference policy motions are advisory, not binding.
- Article 6.20 delegates all Board powers to the Party Leader between Board meetings, subject to ratification.
- The Leader appoints three Board members and key party officers and controls national policy statements.
- A member-led no-confidence trigger requires 50% of all members in good standing to write to the Chairman within a 60-day validity period; the Board then decides the motion.
- The Board retains extensive authority over branches, rules, discipline and candidates.
- The published constitution still cites the historic company number 11694875 rather than current Reform UK Party Limited, company no. 16260766.
- The most evidence-based description is therefore that Reform is a democratised but strongly leader-centred political organisation.

Power Inside Reform: Governance, Membership and Leadership Control

4.2 Control in Practice: Dissent, Discipline and the Farage Leadership Model

EVIDENCE SUMMARY

Purpose: Test the formal governance architecture identified in Section 4.1 against Reform UK's actual handling of dissent, senior departures, disciplinary disputes, candidate vetting and reputational crises from 2024 to August 2026.

Finding: Reform does possess formal disciplinary structures and has repeatedly used suspension, investigation and expulsion powers. The practical record is nevertheless highly centralised and uneven. Senior disagreements have repeatedly become leadership crises; candidate-vetting failures have continued after promises of professionalisation; and the distinction between principled discipline, reputational protection and suppression of dissent is sometimes difficult to resolve from the public evidence alone.

Evidential caution: criticism of Farage's leadership by former colleagues is evidence of internal conflict, not proof that disciplinary action was retaliatory. Conversely, the existence of allegations against a dissenter does not prove that every leadership response was procedurally fair.

Executive Brief

Section 4.1 showed that Reform's constitution is leader-centred. Section 4.2 asks whether that concentration is merely formal or visible in practice.

The record since the 2024 general election shows a recurring pattern: rapid central appointments and removals at the top; public ruptures with senior figures; strong central control over the party brand; and repeated reliance on suspension or withdrawal of the whip when allegations threaten reputational damage.

The most important case is Rupert Lowe. His removal followed serious allegations that Reform was entitled to investigate, and a KC commissioned by the party later found credible evidence supporting bullying or harassment complaints. But the rupture also occurred immediately after Lowe publicly attacked Farage's "messianic" leadership. Lowe denied the allegations, alleged retaliation and pursued legal action. The CPS subsequently decided that the separate threat allegation did not meet the evidential test for prosecution.

Zia Yusuf provides a different example. His sudden resignation as Chairman after publicly criticising a Reform MP's burqa intervention exposed a serious internal policy and communication breakdown; less than 48 hours later he returned in different roles. That episode suggests that Reform can accommodate dissent, but also illustrates how heavily its senior structure depends on personal relationships and rapid leadership intervention rather than settled institutional process.

At local and candidate level, Reform has repeatedly suspended or removed individuals over offensive comments and conduct. Those interventions demonstrate real disciplinary capacity. Yet the frequency with which serious material emerged only after selection or election raises a separate question about the effectiveness and consistency of vetting.

The evidence therefore supports neither “Farage expels everyone who disagrees with him” nor “Reform’s problems are simply normal growing pains”. The more defensible conclusion is that a rapidly expanding party with highly centralised authority has repeatedly struggled to convert leadership control into consistent institutional discipline.

1. The July 2024 Leadership Reset

The first major test came immediately after the 2024 general election. Farage reorganised the senior leadership, replacing long-serving deputy leaders Ben Habib and David Bull, installing Richard Tice as deputy leader and appointing Zia Yusuf as Chairman.

The changes were constitutionally possible under the leader-centred structure then in force and were presented as part of professionalising the party. They also demonstrated the practical speed with which Farage could reshape the senior organisation.

Habib publicly expressed concern about the direction of the party. The episode is important not because leadership reshuffles are unusual — they are not — but because it established a pattern in which strategic disagreements and organisational restructuring were resolved from the centre rather than through a broad membership process.

2. The Derbyshire Resignations: “Autocratic” Leadership as an Internal Criticism

In January 2025, ten Reform councillors in Derbyshire announced their resignations and criticised Farage’s leadership as autocratic. They complained about the treatment of long-standing members, internal democracy and the party’s direction, and aligned themselves with former deputy leader Ben Habib.

Farage rejected their characterisation and said the group had breached party rules. The episode therefore cannot be treated as an independent finding that the party was autocratic.

Its evidential significance is different: criticism of excessive centralisation was not confined to external opponents. It was being made by elected Reform representatives before the February 2025 democratisation reforms examined in Section 4.1.

EVIDENTIAL DISTINCTION

“Former Reform councillors accused Farage of autocratic leadership” is an established fact. “Farage was therefore proven to be autocratic” is not. This chapter preserves that distinction throughout.

3. The Rupert Lowe Rupture

No case better illustrates the difficulty of separating discipline from factional conflict than the breakdown between Nigel Farage and Rupert Lowe.

On 6 March 2025 Lowe publicly criticised Reform’s organisation and described Farage’s leadership as “messianic”. The following day Reform announced that Lowe had lost the party whip. The party said two female employees had made serious bullying complaints and alleged that Lowe had made threats of physical violence against then-Chairman Zia Yusuf. Lowe denied the allegations and characterised the process as a politically motivated attack.

Reform commissioned Jacqueline Perry KC to examine the workplace complaints. Her report, published later that month, concluded that two women had provided credible evidence of bullying or harassment by Lowe and/or members of his team and disputed aspects of Lowe's public account of the complaint chronology. Lowe rejected the report and described its findings as false. The separate alleged threats were outside Perry's inquiry because they had been referred to police.

The Crown Prosecution Service announced on 14 May 2025 that no criminal charges would be brought in relation to the alleged threat. After reviewing witness statements, prosecutors concluded there was insufficient evidence to provide a realistic prospect of conviction.

That CPS decision is important, but it does not retrospectively determine the workplace allegations examined by Perry KC. Equally, the KC report did not establish the separate criminal threat allegation. The two evidential tracks must not be conflated.

Lowe subsequently pursued legal action against Farage and other senior Reform figures over statements made about him, while staff associated with Lowe also challenged publication of the internal report. The dispute therefore moved beyond ordinary party discipline into litigation and an enduring political rupture.

Date	Event	Evidential category
6 Mar 2025	Lowe publicly criticises Reform's organisation and calls Farage's leadership "messianic".	Political dissent
7 Mar 2025	Reform removes whip; cites bullying complaints and alleged threats against Yusuf.	Disciplinary / reputational action
25 Mar 2025	Perry KC report says two women gave credible evidence of bullying or harassment; Lowe rejects findings.	Independent barrister commissioned by party
Apr 2025	Lowe and staff-linked parties pursue legal challenges concerning statements/report publication.	Civil dispute
14 May 2025	CPS decides not to charge over alleged threat because evidential test is not met.	Criminal allegation not prosecuted

Date	Event	Evidential category
2026	Lowe leads Restore Britain and remains a political rival while periodically proposing cooperation with Reform.	Political consequence

WHAT THE LOWE CASE PROVES — AND DOES NOT

It proves that a major internal political dispute coincided with serious disciplinary allegations and ended with a sitting Reform MP outside the party. It does not prove that the allegations were invented to remove a rival: Perry KC found credible evidence supporting the workplace complaints. It also does not prove the alleged threats occurred: the CPS decided the evidence did not meet the prosecution threshold.

4. Zia Yusuf: Resignation, Return and Role Reassignment

The Yusuf episode demonstrates a different kind of organisational instability.

On 5 June 2025 Yusuf resigned as Chairman hours after publicly describing as “dumb” Reform MP Sarah Pochin’s decision to ask the Prime Minister about banning the burqa when that was not then party policy. Yusuf said he no longer believed working to elect a Reform government was a good use of his time.

Less than 48 hours later he returned. Yusuf said his resignation had been a mistake arising from exhaustion and racist abuse. Farage announced that Yusuf would continue working on policy, fundraising, media and the party’s council-efficiency project rather than resume the chairmanship.

David Bull was appointed Chairman on 10 June. Reuters described the appointment as occurring amid internal tensions and as part of Reform’s effort to professionalise its organisation.

The episode cuts both ways analytically. Yusuf was able publicly to disagree, resign and then return to senior influence: that is inconsistent with a simple claim that disagreement automatically produces permanent exclusion. But the speed of the crisis, reversal and redistribution of roles also suggests an organisation in which senior responsibilities can be reconfigured very quickly around the Leader.

5. Discipline Is Real — But It Is Also Highly Centralised

Reform’s constitution contains a formal Discipline Committee, appeal mechanisms and an express requirement for natural justice. Available sanctions include warnings, suspension, expulsion, removal from party office or candidature and withdrawal of the whip.

The party has repeatedly used those powers or equivalent interim measures. This matters because a fair assessment cannot portray Reform as simply ignoring misconduct.

The practical question is consistency: who is suspended immediately, who is permitted to remain while matters are investigated, who is reinstated, and how transparent are the reasons for different outcomes?

Case	Party response	Governance significance
James McMurdock — historic assault conviction	Party initially defended him and said the old conviction would not prevent him passing its new vetting process.	Shows discretion and rehabilitation can outweigh historic misconduct.
James McMurdock — 2025 business allegations	McMurdock removed the whip from himself pending investigation, describing it as precautionary.	Different allegation, different response; avoid conflating with assault conviction.
Laura Anne Jones	Suspended after Welsh parliamentary standards findings concerning a racial slur.	Demonstrates sanction after formal external finding.
Chris Parry	Suspended as mayoral candidate in March 2026 pending investigation after remarks about a Jewish community patrol.	Rapid reputational intervention.
Stuart Niven	Suspended less than a day after being announced as a Scottish candidate when previous company-director misconduct emerged.	Vetting failure followed by rapid correction.
Stuart Prior	Elected in Essex amid allegations of extreme racist social-media material; later resigned and membership was revoked.	Material surfaced too late to prevent candidature/election.
Glenn Gibbins	Suspended, later reinstated after internal process, then charged in July 2026 over an allegedly grossly offensive 2024 post.	Raises questions about internal investigation and reinstatement; charge is not conviction.

6. The Vetting Problem

Farage repeatedly presented professionalisation and improved vetting as essential after the 2024 general election, when Reform had to disown or distance itself from candidates over offensive remarks.

Yet the problem persisted into 2026. Candidates were suspended after announcement; individuals with previously reported controversies reached the ballot; and newly elected councillors were subsequently suspended, expelled or forced to resign when social-media histories became public.

The Stuart Niven case is particularly stark: Reform suspended him less than a day after unveiling its Scottish slate after information emerged that he had been disqualified as a company director. Other 2026 reporting identified candidates with histories of racist, antisemitic or anti-Muslim remarks that had apparently not prevented selection.

This does not establish that Reform deliberately selects extremists. Rapid party expansion creates a genuine administrative challenge, and other parties also experience candidate scandals. The governance criticism is instead one of institutional capacity: a party presenting itself as ready to govern has repeatedly failed to identify publicly discoverable material before candidature.

THE SCALE PROBLEM

Central control and effective control are different things. Reform's leadership has extensive constitutional powers over candidature and discipline, but the repeated emergence of serious candidate material after selection suggests that formal central authority has not consistently translated into reliable due diligence.

7. "Undermining the Party": Discipline and Political Loyalty

Some disciplinary cases concern alleged racism, harassment or other conduct with an obvious reputational dimension. Others concern behaviour characterised more broadly as damaging or undermining the party.

In Kent in October 2025, two Reform councillors were expelled after being accused of undermining the party's interests and bringing it into disrepute. The case followed internal tensions and a leaked meeting. The councillors disputed aspects of the process.

Broad "bringing the party into disrepute" provisions are common in political organisations and are not inherently improper. But in a leader-centred party they create an important governance question: whether the boundary between misconduct and legitimate internal criticism is sufficiently predictable and independently adjudicated.

The constitution's commitment to natural justice and independent appeal panels is therefore important. The report should judge individual cases by whether those safeguards were actually available and used, rather than assume either fairness or retaliation.

8. Leadership Turnover and the Professionalisation Paradox

Farage has consistently argued that Reform must professionalise if it is to move from protest politics to government. The record shows genuine progress: a new constitution, elected Board members, expanded staffing, formal disciplinary mechanisms and a much larger local-government operation.

At the same time, professionalisation has repeatedly been accompanied by unusually visible personnel turbulence: Habib and Bull were displaced from deputy leadership roles in 2024; Yusuf resigned as Chairman and returned in a different capacity in 2025; Bull then became Chairman; Lowe left amid a bitter disciplinary and political rupture; and the party has repeatedly cycled candidates and office-holders through suspension, investigation and replacement.

By August 2026 Reform's website identifies Lee Anderson as Chairman, Richard Tice as Deputy Leader and Zia Yusuf as Shadow Home Secretary. Yusuf's title requires qualification. Reform is entitled to use internal shadow-cabinet titles, but Yusuf is not an elected MP and the title should not be confused with the conventional Westminster role of a parliamentary Shadow Home Secretary. He cannot question the Home Secretary in the Commons as an MP, vote on Home Office legislation, table parliamentary questions or exercise the parliamentary scrutiny functions ordinarily associated with that office. In practical terms he is Reform's senior home-affairs policy spokesman operating under a shadow-cabinet title. The distinction is relevant to this chapter because Yusuf's authority derives from leadership appointment rather than elected parliamentary office. The organisation has therefore continued to absorb and reposition senior figures rather than simply purge everyone involved in disagreement.

The paradox is that the same central flexibility that lets Farage restructure the organisation rapidly can also make institutional roles appear contingent upon leadership confidence rather than durable internal constituencies.

9. A Pattern of Personalised Conflict?

There is enough evidence to identify a recurring organisational pattern, but not enough to assign a single motive to every departure.

Farage has had major public fallings-out with senior figures across the Brexit Party/Reform lineage, and critics including Habib, the Derbyshire councillors and Lowe have independently complained about excessive personal control. Those criticisms are mutually reinforcing as evidence that the perception exists inside the movement.

But perception is not proof of causation. Lowe faced substantive workplace allegations; Yusuf returned almost immediately after resigning; Tice moved from Leader to Deputy Leader and remained central; Bull moved from Deputy Leader to Chairman; and several disciplinary interventions concern conduct that any national party would have legitimate reason to investigate.

The more robust conclusion is therefore structural: because the Leader holds extensive appointment, policy and delegated Board powers, disputes involving Farage have greater organisational consequences than they would in a party where authority is more diffusely distributed.

10. Evidence Matrix: Dissent, Misconduct or Both?

Case	Dissent element	Misconduct element	Outcome
Ben Habib / 2024 reshuffle	Strategic/political disagreement	No comparable misconduct allegation central to removal	Leadership reorganisation
Derbyshire councillors	Explicit criticism of Farage/internal democracy	Party alleged rule breaches	Collective resignation
Rupert Lowe	Explicit criticism of Farage immediately before rupture	Serious workplace allegations; separate threat allegation not prosecuted	Whip removed; enduring split
Zia Yusuf	Public disagreement over burqa intervention	No misconduct case	Resigned, returned and reassigned
James McMurdock	Not principally dissent	Historic conviction; later separate business allegations	Initially defended; later self-suspended whip
Candidate/councillor cases	Generally not dissent	Offensive material, conduct or external findings	Suspension, revocation, expulsion or investigation

THE ANALYTICAL TEST

The relevant question is not whether Reform disciplines people — every serious party must. It is whether rules are clear, investigations are independent, sanctions are proportionate, comparable cases receive comparable treatment, and political disagreement can occur without automatically becoming a question of loyalty to the Leader.

11. What the Evidence Supports

- Reform has functioning disciplinary machinery and has taken action against members and candidates over serious allegations.
- Leadership appointments and organisational restructuring remain highly centralised around Farage.
- Multiple insiders and former representatives have independently complained about excessive centralisation or Farage's leadership style.

- The Lowe case contains both genuine political conflict and independently assessed workplace allegations; reducing it to either “purge” or “vindication” misstates the evidence.
- The CPS decision means the alleged threat attributed to Lowe did not meet the evidential threshold for prosecution.
- Yusuf’s resignation and rapid return show that dissent does not inevitably lead to permanent exclusion.
- Repeated candidate scandals after promises of stronger vetting demonstrate an ongoing institutional-capacity problem.
- The party’s rapid growth provides context for those failures but does not remove the governance responsibility created by seeking national power.

12. What the Evidence Does Not Support

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not justify saying that every Reform suspension is a Farage purge; that Rupert Lowe was cleared of all allegations; that the Perry KC report proved the alleged criminal threats; that Zia Yusuf was expelled for disagreeing with the party; that Reform never disciplines offensive conduct; or that every candidate controversy reflects deliberate endorsement by the leadership. Each proposition collapses materially different evidence into a political slogan.

The Central Governance Question

The practical record makes the constitutional question from Section 4.1 more concrete.

“Can a party be both highly disciplined and internally democratic when the same leadership centre controls appointments, candidate rules, political direction and much of the machinery through which dissent becomes a disciplinary question?”

There is no automatic contradiction between strong leadership and internal democracy. The test is whether institutions remain capable of constraining the leader as effectively as the leader can constrain the organisation.

Power Inside Reform: Governance, Membership and Leadership Control

4.3 Growth Without Infrastructure? Candidates, Councillors and Organisational Capacity

EVIDENCE SUMMARY

Purpose: Examine whether Reform UK's organisational systems — recruitment, vetting, training, discipline and local-government support — have kept pace with its rapid electoral expansion.

Finding: Reform's growth is real and substantial. That scale creates genuine administrative difficulty. But repeated cases in which serious, publicly discoverable material emerged only after candidate approval or election demonstrate that the party's screening and oversight systems have not consistently matched the responsibilities created by that growth.

Caution: This chapter does not use an unverified internet "master list" of Reform scandals as evidence. Individual cases are included only where they can be tied to identifiable reporting or official action, and suspension is not treated as proof of the underlying allegation.

Executive Brief

Reform has undergone an organisational transformation in little more than two years: from a small parliamentary insurgency with a thin local-government presence to a party claiming hundreds of thousands of members and more than two thousand councillors.

Rapid growth itself is not evidence of incompetence. Any organisation recruiting candidates at that speed will experience mistakes, resignations and disciplinary cases. The correct comparison is not with an imaginary scandal-free party, but with the standards Reform itself says it has introduced as part of becoming ready for government.

The strongest evidence of a capacity gap comes from timing. In multiple cases, allegedly racist, antisemitic, Islamophobic, misogynistic or otherwise serious material was discovered after a person had passed through selection — sometimes only after they had been elected. Reform then acted rapidly, but post-election suspension is a remedy for a vetting failure, not evidence that the failure did not occur.

Staffordshire provides a particularly useful longitudinal example. The party won control in 2025, but its council leader Ian Cooper was expelled in December after allegations concerning historic racist social-media material. In March 2026 another Reform county councillor, Lynn Dean, was suspended after the party said she had failed to disclose an account operating under another name during vetting.

The May 2026 elections produced further examples. Stuart Prior resigned his Essex seats and had his Reform membership revoked days after election; Ben Rowe was suspended in Plymouth; and Glenn Gibbins was suspended in Sunderland over historic social-media material, later reinstated with a final warning, and subsequently charged over an allegedly grossly offensive post. A charge is not a conviction.

The recurring problem is therefore not an absence of central disciplinary power. Section 4.2 showed that such power is extensive. The problem is whether a rapidly centralised party has built the human, procedural and information infrastructure needed to exercise that power before reputational failures become elected-office problems.

1. The Scale of the Expansion

The starting point must be the scale of Reform's expansion. In early 2025 the party still had only a modest number of elected local representatives, many of them defectors. The 2025 local elections then gave it control of multiple county and unitary authorities and hundreds of councillors.

The 2026 election cycle expanded that footprint again. Contemporary local reporting records Reform taking control of councils including Sunderland, where 58 Reform councillors were elected. In Essex, 53 Reform members were elected to the county council in May 2026.

Reform's own current website advertises more than 270,000 members and more than 2,400 councillors. Those are party claims and should be treated as such until reconciled against a complete independent councillor register, but they accurately convey the central organisational fact: Reform is no longer operating at the scale of a minor protest party.

That transformation changes the relevant test. A party aspiring to national government must be capable not merely of finding enough names to fill ballot papers, but of screening, training, supervising and supporting large numbers of people exercising public authority.

THE CAPACITY TEST

Electoral growth and organisational maturity are different variables. Winning 2,000-plus councillors would demonstrate extraordinary electoral reach; it would not, by itself, demonstrate that the party possesses the systems needed to recruit and govern 2,000-plus suitable office-holders.

2. What Reform Said It Had Fixed

Candidate quality was already a known vulnerability before the latest expansion. During and after the 2024 general election, Reform faced repeated controversies involving candidates' previous remarks and associations.

Farage subsequently argued that the party had improved its procedures. By 2025 he was publicly defending the quality of Reform's vetting and presenting professionalisation as essential to the party's transition from insurgency to potential government.

That matters evidentially because the benchmark is partly self-imposed. Once a party says its vetting has been substantially strengthened, later failures involving material that existed publicly before selection become evidence with which that claim can be tested.

3. Three Different Vetting Failures

Failure type	What it means	Illustration
Failure to discover	Relevant material exists publicly but is not identified before approval.	Historic social-media posts uncovered by journalists or campaign groups after election.
Failure of disclosure	Candidate does not disclose relevant information or an account requested by the vetting process.	Reform said Lynn Dean failed to declare an account operating under another name.
Failure of judgement	Information is known or identified but the party decides it does not disqualify the candidate, creating later controversy.	Historic convictions or offensive material may be judged spent, irrelevant, rehabilitated or insufficiently serious.

These categories should not be conflated. A hidden pseudonymous account is a different organisational problem from failing to search an ordinary Facebook history, while consciously accepting a candidate with a disclosed past is a political judgement rather than a screening error.

4. Staffordshire: From Electoral Breakthrough to Leadership Crisis

Staffordshire is one of the clearest case studies because Reform moved rapidly from electoral victory to responsibility for running a major county authority.

In December 2025 Reform revoked the membership of Staffordshire County Council leader Ian Cooper after allegations that historic social-media accounts using his name contained racist and bigoted material. Cooper publicly rejected aspects of the criticism and subsequently left the leadership.

The significance is organisational rather than merely personal. A council leader is not a peripheral paper candidate. Selection for a role capable of leading a county authority creates a much higher due-diligence expectation.

The problem did not end with Cooper. In March 2026 Reform suspended Staffordshire county councillor Lynn Dean after allegations concerning racist and discriminatory posts. Reform said its review found that Dean had failed to disclose during vetting a social-media account operating under a different name.

That explanation is important. It suggests the party did have a disclosure process capable in principle of identifying such material, but that the process depended partly upon candidates

supplying complete information. An effective vetting system therefore needs a method for independently checking what applicants do not disclose.

STAFFORDSHIRE LESSON

A declaration form is not the same thing as due diligence. If vetting relies heavily on candidates identifying their own problematic accounts, the people most likely to conceal damaging material are also the people least likely to be detected by the process.

5. Essex: A Candidate Becomes an Elected Governance Problem

The Stuart Prior case demonstrates why the timing of vetting matters.

Prior was one of 53 Reform councillors elected to Essex County Council in May 2026 and also won a Rochford District Council seat. Within days, allegations emerged that historic posts associated with him included racist and Islamophobic material. Prior denied making racist posts when approached by the press.

Reform revoked his membership and Prior resigned his elected positions. The party therefore acted after the material became a public controversy.

From an organisational perspective, however, the relevant question comes one stage earlier: how did a candidate reach two ballot papers and win two public offices before the material triggered the party's intervention?

Once a candidate has been elected, the consequences are no longer internal to the party. Residents may lose the representative attached to the party label they voted for, councils may face vacancies or by-elections, and public money is spent administering the consequences.

6. Sunderland: Suspension, Reinstatement and a Later Criminal Charge

Glenn Gibbins provides a different test of the disciplinary system.

Gibbins was elected to Sunderland City Council in May 2026 as Reform took control of the authority. Days later he was suspended after reports concerning an historic Facebook post about Nigerians. He apologised, describing previous posts as jokes made in extremely poor taste and poor judgement.

In June Reform reinstated him following an internal disciplinary process and issued a final written warning. That is evidence that the party's system is capable of reaching an outcome short of permanent expulsion rather than simply purging every person accused of offensive conduct.

In July 2026 Gibbins was charged in relation to an allegedly grossly offensive 2024 social-media post. The later criminal charge does not prove that Reform's earlier disciplinary decision was wrong: the legal test and the party's disciplinary test are different, and Gibbins is entitled to the presumption of innocence.

It does, however, illustrate the risk created when internal processes must evaluate conduct that may subsequently attract external legal scrutiny.

7. Plymouth and the Post-Election Discovery Problem

Ben Rowe was elected as a Reform councillor for Ham ward in Plymouth in May 2026. Within days Reform suspended him pending investigation after alleged historic social-media posts containing racist, antisemitic and Islamophobic material resurfaced.

Again, suspension demonstrates that the party was willing to respond. But the relevant organisational question is why material sufficiently serious to trigger immediate suspension after election did not trigger scrutiny before the electorate was asked to choose the candidate.

This distinction is fundamental to assessing Reform's claim to professionalisation. Reactive discipline protects the party after a problem emerges; preventive vetting protects voters before the problem reaches public office.

8. Candidate Vetting Is Not Merely a Social-Media Search

A mature candidate-assurance system requires more than searching offensive keywords on X or Facebook.

Depending on the office, due diligence may reasonably include identity verification, declaration of criminal convictions where legally relevant, Companies House history, insolvency and director-disqualification records, public professional discipline, conflicts of interest, past political affiliations, litigation posing obvious reputational risk, and a structured review of public social-media activity.

The Stuart Niven episode discussed in Section 4.2 is relevant here: his suspension shortly after announcement reportedly followed discovery of previous company-director misconduct. That is precisely the kind of information that sits in public records rather than social-media discourse.

None of these checks guarantees that a future representative will behave well. Their purpose is narrower: to reduce the probability that readily discoverable pre-existing information surprises the party and electorate after selection.

9. Defections Create a Different Quality-Control Problem

Reform's growth has not come solely from candidates recruited and elected under its own banner. It has also absorbed councillors and politicians elected for other parties.

Defections can accelerate institutional growth because they provide experienced office-holders without waiting for an election. They also complicate accountability: voters selected the individual under a different manifesto and party label, while Reform inherits both the representative's experience and any undiscovered baggage.

The party therefore needs two distinct assurance systems — one for new candidates and another for incoming defectors. Political prominence or prior elected office should not substitute for due diligence.

This becomes increasingly important as Reform attracts higher-profile defectors. Organisational scale can make recruitment itself a political success while simultaneously increasing the number of relationships, declarations and historical records that central staff must verify.

10. Councillor Turnover: Why the Headline Number Needs Care

There is substantial online interest in compiling running totals of Reform councillors who have resigned, been suspended, expelled or defected. Those lists are useful leads but are methodologically dangerous.

They often mix fundamentally different events: a councillor resigning the seat for personal reasons; leaving Reform but remaining an independent; temporary suspension; permanent expulsion; death; disqualification; movement to another party; and historic councillors elected under another label.

This report therefore does not repeat a single dramatic "X councillors lost" number unless every entry has been independently reconciled against council records or reliable reporting.

The correct publication-grade approach is a councillor event dataset with one row per person, recording election date, authority, original party, event type, event date, stated reason, party response, current status and source. Only then should an attrition rate be calculated.

DATA STANDARD

"Suspended", "expelled", "resigned from Reform" and "resigned as a councillor" are not synonyms. Any future headline attrition figure in this report must preserve those distinctions and use a fixed denominator and cut-off date.

11. Why Rapid Growth Is a Real Mitigating Factor — Up to a Point

Reform is entitled to point out that its organisational challenge is unusual. Screening thousands of candidates and managing thousands of elected representatives in a rapidly changing party is difficult. Established parties possess decades of local associations, staff, institutional knowledge and candidate records that Reform has had to build quickly.

That is a genuine mitigation when assessing individual administrative failures.

But rapid growth is also a strategic choice. Reform has chosen to stand candidates at scale, invite defections, seek control of councils and present itself as a government in waiting. The faster the party expands, the greater the resources it must devote to assurance and training.

Capacity constraints can explain failure. They do not transform failure into success.

12. From Vetting to Governing

Candidate screening is only the first organisational test. Once elected, councillors require training in local-government finance, procurement, planning, adult and children's social care, safeguarding, audit, standards, information governance and the statutory duties attached to public authorities.

Political enthusiasm cannot substitute for that administrative knowledge. Nor is local government simply a platform for national campaigning: many council decisions are constrained by statute, contracts, ring-fenced funding, judicial-review risk and duties to vulnerable residents.

The central question for Reform is therefore shifting. Before its local breakthroughs, critics could ask whether it could find credible candidates. After gaining control of councils, the harder test is whether it can turn a mass intake of political recruits into competent public administrators.

The party's performance in councils should consequently be assessed in later chapters using outcomes rather than anecdotes: budget variance, reserves, audit findings, service performance, statutory interventions, complaints, staff turnover, procurement and delivery against declared savings.

13. An Organisational Maturity Model

Stage	Question	Current evidence
1 — Recruitment	Can the party field candidates?	Clearly achieved at scale.
2 — Screening	Can it identify material risks before selection?	Repeated failures indicate uneven performance.
3 — Training	Can elected representatives understand statutory and financial responsibilities?	Requires council-by-council evidence.
4 — Supervision	Can misconduct and performance problems be detected early and handled consistently?	Formal machinery exists; practical consistency remains under test.
5 — Institutional resilience	Can councils and party structures function despite departures, scandals and leadership changes?	Still developing.
6 — Government readiness	Can the organisation scale these systems to Parliament and national executive government?	Not demonstrated by electoral success alone.

14. What the Evidence Supports

- Reform has expanded from a small local-government presence into a large national councillor network at exceptional speed.
- That growth creates a genuine and unusually demanding recruitment and supervision problem.
- Reform has formal vetting and disciplinary processes and has repeatedly suspended, expelled or investigated representatives when serious allegations emerged.
- Multiple cases show serious pre-existing material being discovered only after candidate approval or election.
- At least some failures involve incomplete candidate disclosure; others appear to involve discoverable public material or judgement calls.

- The recurrence of post-selection discoveries means Reform has not yet demonstrated consistently reliable preventive vetting at the scale at which it now operates.
- The party's willingness to act after a controversy is relevant evidence of governance capacity, but reactive discipline should not be mistaken for successful pre-election screening.
- A reliable overall councillor attrition rate requires a purpose-built event dataset rather than partisan or crowdsourced lists.

15. What the Evidence Does Not Support

NO BASIS FOR THESE CLAIMS

The evidence does not support saying that every Reform councillor is unvetted; that every suspended representative committed the conduct alleged; that Reform deliberately recruits racist candidates; that established parties never suffer candidate scandals; that rapid expansion is irrelevant to administrative failure; or that a handful of individual controversies by themselves prove Reform-run councils are incompetent. Those claims require evidence this chapter does not provide.

The Central Capacity Question

Sections 4.1 and 4.2 established that Reform has concentrated authority. Section 4.3 exposes the corresponding management challenge.

"If the centre possesses the power to approve, suspend and remove candidates, does it also possess the information, staff and institutional systems required to exercise that power competently across thousands of representatives?"

That is a more important test of government readiness than the number of candidates a party can recruit or seats it can win.

Key Findings

- Rapid electoral expansion is a genuine organisational achievement and a genuine capacity risk.
- Post-election suspension can demonstrate disciplinary responsiveness while simultaneously revealing a pre-election screening failure.
- Staffordshire, Essex, Sunderland and Plymouth provide documented examples of different weaknesses in screening, disclosure or judgement.
- Reform's own explanation in the Lynn Dean case confirms that its vetting system relies at least partly on candidate disclosure.
- The party needs independent verification mechanisms capable of finding material candidates omit.
- Councillor controversies must be classified accurately: temporary suspension is not expulsion, leaving a party is not resigning a council seat, and allegation is not proof.
- The next evidential step should be a verified councillor-event dataset and outcome-based assessment of Reform-run authorities.

- The broader question has moved from whether Reform can win local power to whether its institutional infrastructure can administer it.

Power Inside Reform: Governance, Membership and Leadership Control

4.4 The First Test of Government: What Happened in Reform-Run Councils?

EVIDENCE SUMMARY

Purpose: Move beyond party organisation and test Reform UK where it has exercised executive local-government power. The chapter compares political claims with council budgets, monitoring reports and pre-Reform baselines.

Finding: Reform administrations have produced identifiable savings and policy changes. They have also encountered the same structural pressures that dominate English local government: adult social care, children's services, SEND, inflation, transport and statutory duties. The early record does not support either "Reform found no savings" or "Reform has already proved its national economic model".

Method: Planned saving, cost avoidance, capital reprofiling, debt reduction and cash revenue saving are treated as different things. Inherited budgets are separated from Reform decisions wherever the evidence permits.

Executive Brief

Kent, Staffordshire and Derbyshire provide the clearest first-year tests because Reform took control in May 2025 and subsequently set 2026/27 budgets. Each authority entered Reform control with an existing budget, contracts, statutory obligations and medium-term financial pressures created under previous administrations.

All three Reform-led county councils examined here raised council tax for 2026/27. Kent and Staffordshire chose 3.99%; Derbyshire chose 4.90%. These were below the maximum increases available without referendum or special permission, but they demonstrate an immediate governing reality: efficiency programmes did not eliminate the need for additional tax revenue.

There are genuine savings. Staffordshire identified £21.5m of efficiencies while adding investment to children's services and highways. Derbyshire's budget contains £55.3m of savings, including £35.5m of new ongoing savings and £7.4m of new one-off savings. Kent reports multiple identifiable efficiency and debt-management measures.

But attribution matters. A budget line appearing under a Reform administration is not automatically a saving invented by Reform. Some programmes pre-date the election; some are revised existing plans; some are capital expenditure avoided rather than cash returned to the revenue budget; and some depend on assumptions that can only be judged at outturn.

Kent illustrates the problem most clearly. During 2025/26 it forecast an unprecedented £46.5m revenue overspend at Quarter 2, described by its Deputy Leader as a critical risk to financial resilience. The final outturn still required a draw from General Fund reserves. At the same time, the administration reported savings, debt reduction and future cost avoidance. Both statements can be true because they measure different financial phenomena.

The correct test of Reform local government is therefore not whether a press release contains a large savings number. It is whether recurring expenditure falls sustainably without statutory failure, whether savings are actually delivered, whether reserves and debt remain resilient, and whether service outcomes improve.

1. The Inheritance Rule

The 2025 local elections took place after the 2025/26 financial year had begun. Reform administrations therefore inherited budgets that had already been legally set by their predecessors.

They also inherited multi-year contracts, capital programmes, staffing structures, social-care placements, SEND obligations and existing savings plans. A forecast overspend appearing during 2025/26 cannot simply be attributed in full either to Reform or to the outgoing administration.

The defensible approach is to distinguish three periods: inherited position at takeover; in-year management decisions after takeover; and the first full budget deliberately set by the Reform administration. For Kent, Staffordshire and Derbyshire, the 2026/27 budget is therefore a much cleaner test of political choices than the opening weeks of 2025/26.

ATTRIBUTION RULE

A council's financial year does not reset when an election changes political control. This report will not attribute an inherited budget wholesale to the incoming administration — or allow the incoming administration to attribute every later pressure wholesale to its predecessor.

2. Kent: The Flagship Test

Kent matters because Reform itself has treated the authority as a proving ground for its efficiency agenda. The administration created a local-government efficiency programme, DOLGE, and repeatedly publicised savings, debt reduction and the removal of expenditure it regarded as unnecessary.

The scale of the authority makes superficial comparisons dangerous. Kent spends more than £2.8bn a year excluding schools; adult and older-people services alone account for roughly £35 of every £100 spent, with children's social care and other children's services consuming another £26. A large majority of the budget is therefore driven by services that cannot simply be abolished as political "waste".

In November 2025 the council's Quarter 2 monitoring reported a forecast £46.5m overspend, approximately 3% of the relevant budget. Deputy Leader Brian Collins described the position as unprecedented and a critical risk to financial resilience. The principal pressures included adult social care and SEND.

That figure was a forecast, not the final annual loss. By June 2026 the formal outturn report required Cabinet to approve drawing on General Fund reserves to fund the remaining 2025/26 overspend. This is a more accurate description than claiming that Reform simply "overspent by £46.5m".

3. Kent's £100m Claim: What Is Actually Inside It?

Kent stated in February 2026 that it was on course to deliver £100m of savings during the year. The same statement separately said that £39.5m of potential future spending had been reprofiled and that debt had been reduced by £67m.

Those categories must not be added together and presented as a single cash saving. Debt repayment changes the balance sheet and future financing costs; reprofiling changes the timing or assumed future cost of expenditure; a recurring revenue efficiency reduces annual expenditure; and cancelling a potential capital scheme may constitute cost avoidance rather than money recovered from an existing budget.

Kent itself subsequently made this distinction explicit when responding to criticism of the £39.5m figure. The council said it had never described £39.5m as realised savings, but as reprofiling of potential future spend or future cost avoidance.

That clarification is important because it provides a useful standard for evaluating Reform's wider rhetoric: "money we will no longer spend", "debt repaid", "future borrowing avoided" and "annual saving" can all be economically valuable, but they are not interchangeable.

Financial term	What it means	How report treats it
Recurring revenue saving	Ongoing reduction in annual net spending	Potentially strongest if delivered without displaced cost
One-off saving	Reduces expenditure once	Helps one budget year; does not permanently close structural gap
Cost avoidance	Prevents a future cost from arising	Potentially valuable, but not cash recovered from existing expenditure
Capital reprofiling	Moves or revises planned capital spend	May improve affordability; not automatically a saving
Debt repayment	Reduces principal owed	Improves balance sheet and future interest exposure; uses available cash/resources

Financial term	What it means	How report treats it
Discount on early debt repayment	Reduction in amount otherwise repayable	Quantifiable financing benefit if transaction completed
Income generation	Raises revenue rather than cutting cost	Can improve net budget if assumptions materialise

4. Kent: Savings That Can Be Identified

The existence of accounting caveats should not be used to pretend Kent has achieved nothing. Council material identifies concrete measures that can be tested.

Examples include a reported £1.5m saving from bringing some children's-home provision in-house; £2.5m from changes to home-to-school transport planning; £12m of future financing cost avoided by remaining at Sessions House; and a reported £5.5m discount associated with repaying £50m of long-term debt early.

The council also approved governance restructuring expected to save £75,000 annually through fewer committees and operational changes including AI-assisted minute production. These are modest beside a multibillion-pound budget, but they are precisely the kind of identifiable recurring efficiencies that should be separated from larger political headline figures.

The test is delivery. Proposed or modelled savings should be upgraded to "realised" only when monitoring or audited outturn demonstrates that expenditure actually fell as claimed and that costs were not merely transferred elsewhere.

5. Net Zero and the £40m Headline

Kent's cancellation or removal of prospective net-zero-related capital spending became one of the most politically prominent savings claims.

The council's own savings page describes £40m as saved from the capital programme over four years by rescinding net-zero targets. But in a later response to criticism, KCC stressed that £39.5m referred to potential future spend and should be understood as future cost avoidance or reprofiling rather than realised cash savings.

The distinction does not make the decision financially meaningless. If projects would otherwise have proceeded and required borrowing or council resources, cancelling them can improve future affordability. But saying "£40m was saved" without explaining that the figure largely concerns expenditure that had not yet occurred invites readers to imagine £40m of existing waste was discovered and removed.

For this report, the correct classification is therefore: policy-driven capital cost avoidance / reprofiling, not £40m of verified recurring revenue savings.

HEADLINE VERSUS ACCOUNTING

Kent provides an unusually clear example of why this report separates political language from accounting treatment. “We stopped £40m being spent” may be a defensible political claim. “We found £40m of existing annual waste” would describe something materially different.

6. Kent’s First Reform Budget

On 12 February 2026 Kent approved its first full budget under Reform control. The council set a 3.99% council-tax increase, below the 5% cap referenced by the authority, and approved a balanced budget. The net revenue requirement was subsequently revised to £1.6545bn following final funding announcements.

The budget allocated £787.5m to adult social care and £423m to children’s services. Those numbers help explain why culture-war expenditure cannot plausibly dominate the financial challenge: social care and statutory children’s responsibilities operate on an entirely different scale.

The administration argued that its efficiency programme and debt reduction enabled it to hold the tax increase below the maximum. That is a legitimate political claim, but causal attribution requires a counterfactual: what would council tax and service spending have been under an alternative administration given the same government settlement, demand pressures and inherited position?

What can be established without that counterfactual is narrower: Reform did not freeze or cut council tax; it chose a 3.99% increase while pursuing savings and efficiency measures.

7. Staffordshire: Savings Alongside New Investment

Staffordshire offers a useful comparison because its first Reform budget combines efficiency claims with explicit additional investment.

For 2026/27 the county set a net budget of approximately £840.8m. Council material says the administration identified £21.5m of efficiencies while allocating an additional £5.5m to children and families services and an additional £15m to highways.

The published examples of efficiency are largely operational rather than ideological: reducing adult-social-care placement costs, earlier intervention intended to reduce children’s placements, reviewing longstanding contracts and a recruitment freeze on non-essential posts that the council said had already saved £1m.

Staffordshire also increased council tax by 3.99%, comprising a 1.99% general increase and 2% for adult social care. The council emphasised that this was below the 4.99% level it said government expected and retained Staffordshire’s position among the lower-tax county councils.

This is important because it demonstrates what Reform government looks like once confronted with service delivery: not simply abolishing discretionary programmes, but contract management, prevention, workforce control, care-placement economics and tax decisions.

8. Staffordshire's Inherited Baseline

The pre-Reform baseline prevents the 2026 budget from being interpreted as a transformation from financial chaos.

KPMG's annual auditor report for 2024/25 records that Staffordshire finished that pre-Reform year with a £5.3m general-fund underspend, increased general-fund balances and an unused £15m contingency. The auditor described regular monitoring and transparent reporting, while also identifying a serious SEND High Needs Block deficit of £53.6m.

In other words, Reform inherited a council with significant structural pressures but also evidence of established financial management and reserves. Its later savings should be credited where they are new and delivered; they should not be framed as though prudent financial management began only after May 2025.

9. Derbyshire: A Balanced Budget Still Requires £55m of Savings

Derbyshire's first full Reform budget presents perhaps the clearest illustration of the scale of ordinary local-government pressure.

The council approved a £817.6m net budget for 2026/27 and a 4.90% council-tax increase. It included £55.3m of savings: £35.5m of new ongoing savings, £7.4m of new one-off savings and £12.4m previously approved for 2025/26.

The authority said rising costs and demand in children's services, SEND and adult social care were central pressures. Some proposed savings required further consultation, including a proposal concerning the Glossop household waste recycling centre.

The numbers therefore require two qualifications. First, not all £55.3m originated with the Reform administration because £12.4m had already been approved in the previous budget. Second, a savings requirement is not the same as a delivered saving: implementation and outturn determine whether the target is achieved.

Derbyshire nevertheless demonstrates that Reform is engaging with the real mechanics of local government: difficult savings, service consultations and a near-maximum council-tax increase rather than an effortless removal of ideological "waste".

10. Comparative First-Budget Snapshot

Authority	2026/27 budget	Council tax	Headline action	Key qualification
Kent	£1.6545bn revised net requirement	3.99%	Savings/ efficiency programme; debt reduction; capital cost avoidance	2025/26 outturn required General Fund reserve draw

Authority	2026/27 budget	Council tax	Headline action	Key qualification
Staffordshire	£840.8m	3.99%	£21.5m efficiencies; investment in children/highways	Inherited 2024/25 £5.3m underspend; SEND deficit remains structural risk
Derbyshire	£817.6m	4.90%	£55.3m savings in budget, including £12.4m previously approved	Delivery risk; some proposals subject to consultation

11. The Council-Tax Reality

Reform's local record already demonstrates the difference between opposition rhetoric and executive responsibility. Once responsible for balanced budgets, its administrations have used council-tax increases as part of the funding mix.

That does not constitute evidence of hypocrisy by itself. Circumstances, government settlements and statutory demand can make tax rises rational even for a low-tax party. Nor did the three councils examined use the full increase available to them.

The important conclusion is more structural: the claim that large amounts of discretionary ideological spending can be removed and thereby transform local taxation is not supported by these first budgets. The dominant pressures remain care, children, SEND, inflation, transport and existing financial commitments.

12. Savings Do Not Equal Service Outcomes

A council can balance its budget while providing deteriorating services; it can overspend because demand rises while still improving outcomes; and it can cut expenditure in a way that creates larger costs later.

Financial performance must therefore be paired with service indicators. For adult social care, that might include delayed discharges, waiting times, provider stability and safeguarding. For children's services: placement stability, timeliness and Ofsted judgements. For SEND: EHCP timeliness, tribunal outcomes, transport costs and High Needs deficits. For highways: condition, repair times and claims.

This is particularly important for "prevention" savings. Early intervention can genuinely save money and improve lives, but projected downstream savings should not be booked rhetorically as achievements before the relevant demand actually falls.

13. Local Government Reorganisation Complicates the Experiment

The Reform council experiment will not occur in a stable institutional environment.

Government decided in July 2026 that existing council structures in Kent, Staffordshire and Derbyshire will be reorganised for 2028. Kent and Medway are due to move to four unitary councils; Staffordshire and Stoke-on-Trent to two; Derby and Derbyshire to two.

This creates both opportunity and analytical noise. Reorganisation may generate genuine economies of scale, but transition itself costs money, changes staffing and assets, and can cause projects to be delayed or cancelled. Savings arising from abolition or merger of authorities should not automatically be attributed to Reform's ordinary efficiency programme.

It also shortens the period over which some current Reform administrations can be assessed in their existing institutional form.

14. What Counts as Success?

Test	Measure	Best evidence
Budget delivery	Actual outturn versus approved budget	Audited accounts / monitoring
Savings delivery	Percentage of approved savings actually realised	Savings tracker / outturn
Resilience	General reserves, earmarked reserves, debt and liquidity	Accounts / S151 reports
Tax burden	Council-tax change relative to baseline and comparable authorities	Budget resolutions
Service quality	Statutory and operational outcomes	Ofsted/CQC/council performance data
Capital discipline	Delivery, slippage, borrowing and asset condition	Capital monitoring
Governance	Audit recommendations, procurement, scrutiny and standards	External audit / committee reports
Sustainability	Whether savings recur without creating larger later costs	Multi-year outturn

THE FAIR TEST

Reform should receive credit for savings it can demonstrate and responsibility for choices it actually makes. It should receive neither automatic blame for inherited structural deficits nor automatic credit for pre-existing savings programmes. The same attribution rule must apply in both directions.

15. What the Evidence Supports

- Reform-controlled county councils have produced balanced first full budgets and identifiable efficiency measures.
- Kent, Staffordshire and Derbyshire all increased council tax in 2026/27 despite efficiency programmes.
- Kent experienced serious 2025/26 financial pressure and ultimately used General Fund reserves to fund its outturn overspend.
- Kent has identified genuine efficiency and financing measures, but some of its largest political savings headlines concern future cost avoidance, debt management or capital reprofiling rather than recurring revenue savings.
- Staffordshire's £21.5m efficiency programme sits alongside new spending on children's services and highways and a relatively strong pre-Reform financial baseline.
- Derbyshire's £55.3m savings figure includes £12.4m approved before Reform's first full budget and includes both ongoing and one-off measures.
- The dominant financial pressures reported by these councils are mainstream statutory-service pressures rather than discretionary culture-war expenditure.
- It is too early to judge the administrations primarily by budgets: audited outturn and service outcomes are the stronger test.

16. What the Evidence Does Not Support

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying Reform "bankrupted Kent"; that the £46.5m Kent forecast was wholly created by Reform; that Reform found no genuine savings; that every pound labelled as a saving is cash already realised; that a balanced budget proves services are well run; that council-tax rises automatically disprove a low-tax philosophy; or that inherited Conservative financial pressures absolve Reform of decisions made after it took control.

The Central Government-Readiness Question

The first year of Reform local government replaces a hypothetical argument with an empirical one.

"Can Reform turn highly visible efficiency politics into recurring, audited savings while maintaining statutory services — once the easy headlines

have been separated from the hard economics of care, children, SEND, debt and infrastructure?”

The answer is not yet settled. The evidence now exists to measure it.

Power Inside Reform: Governance, Membership and Leadership Control

4.5 The Attrition Audit: What Actually Happened to Reform's Councillors?

EVIDENCE SUMMARY

Purpose: Replace partisan running totals with a reproducible method for counting Reform UK councillor status changes. This first audit distinguishes loss of the party whip from loss of elected office, separates temporary suspension from permanent departure, and uses fixed cohorts where the denominator can be established.

Finding: Reform has experienced material councillor attrition and disciplinary churn in several high-profile authorities. The strongest evidence is local rather than a single national headline: Kent fell from 57 Reform councillors elected in May 2025 to 48 with the whip by early November; Cornwall fell from 28 elected in May 2025 to 23 by late October and 21 by May 2026. The May 2026 intake produced further rapid post-election cases in Essex, Plymouth, Sunderland and Sefton.

Caution: A suspension is not an expulsion; leaving Reform is not resigning a council seat; and one councillor can generate several sequential events. This chapter therefore counts people and events separately.

Executive Brief

The phrase "Reform has lost X councillors" is usually too imprecise to be useful. A councillor may lose the whip temporarily but remain a party member; be expelled yet remain in office as an independent; resign from Reform voluntarily; defect to another party; or resign the elected seat altogether. Counting each event as a separate "loss" can double-count the same person.

The audit therefore uses two measures. Cohort attrition asks how many members of an identifiable Reform election cohort still hold the Reform whip at a later fixed date. Event churn records suspensions, expulsions, voluntary departures, defections and seat resignations without pretending they are equivalent.

Kent is the cleanest 2025 cohort. Reform won 57 of 81 seats in May. After suspensions, expulsions and a defection, contemporaneous reporting said 48 Reform councillors remained by late October/early November: nine fewer than the election cohort, or 15.8%. That does not mean nine people resigned their seats.

Cornwall provides a second clean cohort. Reform won 28 seats in May 2025. Five councillors left the party in October to form a Cornish Independent Non-Aligned group, taking the Reform group to 23.

Cornwall Council's official political breakdown recorded 21 Reform councillors by 21 May 2026: seven fewer than the original cohort, or 25%.

The 2026 election cycle then produced a different problem: candidates whose historic material became a party crisis almost immediately after election. Stuart Prior resigned two council seats after his membership was revoked; Ben Rowe and Glenn Gibbins were suspended within days of election; and other cases require verification before inclusion in a national total.

The defensible conclusion is not a sensational national number. It is that Reform has experienced measurable attrition in key cohorts and substantial disciplinary churn, while the absence of a clean national councillor registry makes a precise nationwide percentage a research project rather than a slogan.

1. The Counting Problem

Political commentary often treats every adverse status change as though a councillor has disappeared from public office. That is wrong. Councillors normally retain their elected seats when they leave or are expelled from a political party; they simply sit under a different political description unless they separately resign the office.

A second error is double counting. A councillor can be suspended in October, expelled in November and join another party in December. That is three events but one person lost from Reform's group.

A third error is denominator drift. Comparing a current group size with a national figure that includes defectors recruited after an election, or mixing county, district and unitary councillors, can create an apparently precise percentage that has no coherent population behind it.

Event	Meaning	Audit treatment
Suspension / whip withdrawn	Temporary or pending status; councillor usually remains in office.	Do not count as permanent departure unless later outcome confirms it.
Expulsion / membership revoked	Permanent party action at that date.	Counts as loss from Reform group, not necessarily loss of council seat.
Voluntary resignation from Reform	Councillor leaves party but may remain elected.	Counts as party attrition.
Defection	Councillor joins another party.	Counts once as party attrition; later destination is an outcome, not a second loss.
Resignation of council seat	Elected office itself is vacated.	Distinct event; may trigger vacancy/by-election.

Event	Meaning	Audit treatment
Leadership resignation only	Leaves an internal role but remains Reform councillor.	Not councillor attrition.
Reinstatement	Suspension ends and Reform status is restored.	Reverses temporary churn; do not count as permanent loss.

CORE RULE

Count people for attrition and events for organisational churn. Never add “suspended + expelled + defected” unless the underlying names have first been deduplicated.

2. Kent: A Fixed Cohort With a Measurable Loss

Reform won 57 of Kent County Council’s 81 seats in May 2025, giving the party outright control and making Kent its flagship local-government test.

By 20 October four councillors — Paul Thomas, Oliver Bradshaw, Bill Barrett and Maxine Fothergill — had the whip suspended following a leaked internal meeting. Subsequent disciplinary action expelled several Kent councillors. ITV reported on 28 October that the accumulation of suspensions and removals had left fewer than 50 Reform councillors on the authority.

On 6 November the Guardian reported the suspension of Isabella Kemp and stated that Reform had then lost nine of the 57 councillors elected in May. That produces a clean cohort measure: 48 of the original 57 still held the Reform whip, equivalent to 84.2%; nine, or 15.8%, no longer did.

This figure is not a “resignation rate”. The nine comprised different statuses and outcomes. Nor does it mean Kent County Council had nine vacancies. The metric measures loss from Reform’s elected cohort, not loss from elected office.

KENT COHORT RESULT

May 2025 Reform cohort: 57. Reported Reform councillors remaining by 6 November 2025: 48. Cohort attrition from the Reform whip: 9 / 57 = 15.8%. This is a party-status measure, not a council-seat vacancy measure.

3. Kent Also Demonstrates Why Event Counts Inflate

Bill Barrett illustrates the problem. He was suspended and subsequently expelled. Recording both events is useful for a chronology, but counting them as two councillors “lost” would be false.

The same principle applies to councillors who are suspended and later join another party. The audit records the transition path — Reform → suspended → expelled/left → new affiliation — while counting the individual only once when measuring cohort attrition.

This is why press stories stating that a party has “lost” a certain number can be accurate at a particular date while a cumulative list of disciplinary events can be much larger.

4. Cornwall: Voluntary Departure Rather Than Discipline

Reform won 28 of Cornwall Council’s 87 seats in May 2025, becoming the largest single group but falling short of the 44 required for a majority.

In October, five councillors — Robert Parsonage, Rowland O’Connor, Karen Knight, Christine Parsonage and Anna Thomason-Kenyon — left Reform and formed a Cornish Independent Non-Aligned group. ITV reported that Reform’s group therefore fell from 28 to 23.

The reasons publicly advanced by former group leaders were political and organisational rather than disciplinary. They complained that Reform’s national focus on issues such as immigration and net zero conflicted with their desire to concentrate on local housing, buses, public services and cross-party cooperation. Reform said it was disappointed by the resignations and wished them well.

By 21 May 2026 Cornwall Council’s official political breakdown listed 21 Reform councillors. Relative to the May 2025 election cohort, that is a reduction of seven, or 25%. The official breakdown does not by itself explain every individual transition, so the extra two departures beyond the October five should be treated as requiring person-level reconciliation before a national dataset is finalised.

CORNWALL COHORT RESULT

May 2025 Reform cohort: 28. After five October departures: 23. Official Cornwall Council Reform group at 21 May 2026: 21. Net cohort reduction: 7 / 28 = 25%. Five of those seven are individually established by ITV’s October reporting; the remaining transitions require row-level verification.

5. Staffordshire: Leadership Loss Is Not Necessarily Seat Loss

Staffordshire shows another classification trap. Council leader Ian Cooper had his Reform membership revoked in December 2025 following allegations concerning historic social-media material. That removed a senior figure from the Reform group and leadership structure, but it did not automatically erase his elected council mandate.

In March 2026 Lynn Dean was suspended pending investigation after allegations concerning social-media posts. Reform said its review found that an account operating under another name had not been disclosed during vetting.

For a national attrition dataset, Cooper belongs in the permanent-party-departure category from the date membership was revoked. Dean belongs in the suspension category until a verified final outcome is recorded. Treating both identically would overstate permanent attrition.

6. The May 2026 Intake: How Quickly Can a New Cohort Fracture?

The 2026 elections created a fresh cohort large enough that national attrition should eventually be measured against election-result data rather than Reform’s changing website total.

Essex provides the clearest immediate example. Reform won 53 county seats on 7 May. Stuart Prior, one of those councillors and also a newly elected Rochford district councillor, resigned both elected

positions within days after Reform revoked his membership over allegations concerning historic social-media posts. Prior denied making racist posts when approached by the press.

In Plymouth, newly elected Ben Rowe was suspended pending investigation days after winning Ham ward following allegations about historic social-media material.

In Sunderland, Glenn Gibbins was suspended shortly after election, then reinstated after an internal disciplinary process with a final written warning. He was later charged over an allegedly grossly offensive 2024 post. The charge is not a conviction. For attrition purposes his reinstatement means the suspension should not be counted as a permanent Reform loss at that point.

These examples show why a simple cumulative scandal count cannot answer the attrition question. The status at the audit cut-off date matters.

7. A Verified Starter Ledger

Authority	Starting cohort	Verified change	Cohort measure	Status
Kent	57 elected May 2025	9 no longer with Reform whip by 6 Nov 2025	15.8%	Guardian/ITV fixed-date reporting
Cornwall	28 elected May 2025	5 left by 27 Oct 2025; group 21 by 21 May 2026	17.9% by Oct; 25.0% net by May	ITV + Cornwall Council
Essex County	53 elected May 2026	Stuart Prior membership revoked and seat resigned	1.9% minimum immediately identified	Essex Council + ITV
Staffordshire	2025 Reform-controlled cohort	Ian Cooper membership revoked; Lynn Dean suspended	Not calculated here	Individual cases verified; denominator reconciliation pending
Sunderland	58 elected May 2026 reported locally	Gibbins suspended then reinstated	No permanent loss from that case at reinstatement	ITV

Authority	Starting cohort	Verified change	Cohort measure	Status
Plymouth	2026 Reform cohort	Ben Rowe suspended pending investigation	Temporary status only	ITV

8. What We Can Say Nationally — and What We Cannot Yet

It is safe to say that Reform has experienced repeated councillor suspensions, expulsions, voluntary departures and defections across multiple authorities since its 2025 local breakthrough, followed by further cases after the much larger 2026 intake.

It is not yet publication-grade to state a single nationwide attrition percentage. Reform's councillor population changes through elections, by-elections and defections into the party as well as departures from it. A denominator must therefore be tied to a specific cohort and date.

The party's own headline councillor count is useful for scale but unsuitable as the sole denominator because it is dynamic and may combine people elected under Reform with later defectors.

The national audit should therefore be built from official election results and council political-composition pages, then reconciled against reliable reporting for the reason and date of each status change.

PUBLICATION STANDARD

A future sentence such as "Reform lost 41 councillors" will appear in this report only if 41 named rows can be produced, deduplicated, assigned an event category and verified against a fixed cut-off date. Until then, local cohort figures are stronger evidence than a national viral total.

9. Proposed Event-Level Dataset

Field	Purpose
Councillor	Full name
Authority	Council and ward/division
Election cohort	Date and party label when elected
Reform start date	Election or later defection into Reform
Event date	Date status changed

Field	Purpose
Event type	Suspension / expulsion / voluntary departure / defection / seat resignation / reinstatement
Reason category	Conduct / vetting / political disagreement / personal / unknown
Allegation status	Allegation / party finding / external finding / charge / conviction
Post-event affiliation	Independent / another party / Reform reinstated / seat vacant
Seat retained?	Yes / no / unclear
Primary source	Council, court, police, regulator or party where available
Secondary source	Reliable reporting
Audit cut-off	Date on which status was checked

10. Why Attrition Matters — and Why It Can Be Overstated

Councillor attrition matters because parties rely on elected groups to staff cabinets, scrutiny panels, planning committees, corporate-parenting responsibilities and quasi-judicial functions. A loss of experienced or numerous members can reduce the pool from which those roles are filled.

High churn can also reveal weaknesses in candidate selection, group management or the relationship between national and local priorities. Kent and Cornwall illustrate different mechanisms: disciplinary conflict in one, voluntary political separation in the other.

But attrition can be overstated as a proxy for governing failure. A councillor leaving a party does not necessarily stop performing council duties, and a party can replace internal office-holders without services collapsing. The relevant downstream test is whether churn damages committee coverage, decision-making, administration or service outcomes.

The attrition audit is therefore an organisational-risk indicator, not a standalone verdict on competence.

11. What the Evidence Supports

- Reform's Kent May 2025 cohort experienced a verified 15.8% reduction in councillors holding the Reform whip by early November 2025.

- Reform's Cornwall May 2025 cohort fell from 28 to 23 after five voluntary departures in October and stood at 21 on the council's official political breakdown in May 2026 — a 25% net reduction from the election cohort.
- The reasons for attrition differ materially between authorities; Cornwall's five-person split cannot simply be classified as disciplinary expulsion.
- The May 2026 election cycle produced further rapid suspensions and at least one verified case, Stuart Prior, in which a newly elected Reform councillor lost membership and resigned elected office within days.
- Temporary suspension must be distinguished from permanent loss: Glenn Gibbins was reinstated after his suspension.
- Event totals must be deduplicated before they are converted into claims about councillors lost.
- A national attrition percentage is feasible, but only after an official-result-based person-level dataset is completed.

12. What the Evidence Does Not Support

NO BASIS FOR THESE SHORTCUTS

The evidence does not support treating every suspension as an expulsion; saying every councillor who leaves Reform resigns their elected seat; adding suspensions and later expulsions of the same person as separate councillors lost; assuming every departure is caused by racism or misconduct; or using Reform's changing national councillor total as though it were a fixed election cohort.

The Central Attrition Question

The important question is not how large a scandal list can be assembled. It is whether the party can retain, supervise and replace elected representatives at a rate consistent with stable government.

> **"When Reform wins a large cohort of councillors, what proportion still carries the party whip one year later — and why did the others leave?"**

Power Inside Reform: Governance, Membership and Leadership Control

4.6 From Attrition to Administration: Does Churn Affect Council Performance?

EVIDENCE SUMMARY

Purpose: Test whether the councillor churn identified in Section 4.5 has produced measurable institutional consequences: loss of political control, cabinet disruption, committee vacancies, by-elections, leadership changes or interruption to council business.

Finding: Effects are uneven. Large majorities can absorb suspensions without losing control, while a single council-seat resignation can trigger a by-election and permanently reduce a majority. Leadership churn carries greater administrative cost because executive portfolios and political coordination must be reassigned.

Caution: Political instability and administrative failure are not synonyms. Professional officers and statutory structures provide continuity; the correct test is whether churn changes decision-making capacity, representation, scrutiny or measurable service outcomes.

Executive Brief

Section 4.5 established that councillor attrition must be counted carefully. Section 4.6 asks the harder question: does it actually matter to government?

Staffordshire provides the clearest leadership-disruption example. After council leader Ian Cooper resigned in December 2025 and became an independent, deputy leader Martin Murray became Acting Leader. Reform later elected Murray as group leader and Full Council formally elected him council leader on 26 March 2026. Murray's former Economy and Skills portfolio then had to be reassigned to Robin Hall.

Essex provides the clearest electoral consequence. Reform won 53 county seats in May 2026. Stuart Prior then resigned, triggering a Rayleigh West by-election. The Conservatives won the seat on 18 June, reducing Reform to 52 councillors. Reform retained control, but an internal candidate failure became an externally adjudicated electoral loss.

Cornwall illustrates a different effect. Reform won 28 seats but no majority and did not form the administration. Five councillors then left the group, including its leader and deputy leader. Reform fell to 23 seats at that point and by May 2026 Cornwall Council recorded 21 Reform councillors.

Kent shows why raw attrition numbers can overstate immediate administrative consequence. Reform began with 57 of 81 seats. Vacancies and suspensions created replacement work and political turbulence, but the original majority provided substantial numerical resilience.

1. Councils Are Designed to Survive Political Churn

Local authorities are statutory corporations, not extensions of political parties. Permanent chief executives, monitoring officers, Section 151 finance officers, directors and professional staff continue to exercise legal responsibilities when councillors resign or political leadership changes.

Political churn matters through a different mechanism: it changes who authorises strategy, holds executive portfolios, chairs committees, scrutinises decisions and commands enough votes to pass budgets and policies. The useful question is therefore not merely who left, but what function the departure disturbed.

2. Staffordshire: When Attrition Reaches the Executive

After Ian Cooper left Reform and resigned as Leader in December 2025, he remained a councillor as an independent. There was no electoral vacancy, but there was an immediate executive succession problem.

Martin Murray became Acting Leader on 9 December. Reform members elected him group leader on 17 March 2026 and Full Council elected him Leader on 26 March. His elevation then required his Economy and Skills portfolio to be reassigned to Robin Hall on 31 March.

One person leaving the governing party therefore generated an acting-leader period, a party leadership election, a Full Council leadership decision and a Cabinet portfolio replacement. The council remained operational, but continuity required institutional work.

3. Essex: From Candidate Failure to Electoral Loss

Reform won 53 seats at the May 2026 Essex County Council election. Stuart Prior's resignation in Rayleigh West created a by-election only weeks later.

On 18 June Conservative Stuart Belton won Rayleigh West with 1,515 votes; Reform's Denise Martin finished third with 1,046. Essex County Council then recorded Reform on 52 seats and the Conservatives on 14.

Reform remained securely in control. But the sequence is measurable: a candidate passed selection, was elected, resigned following controversy, and the replacement election transferred the seat to an opponent. The authority also had to administer an additional election.

4. Cornwall: Attrition Without Executive Control

Reform emerged from the May 2025 Cornwall election as the largest group with 28 of 87 seats but lacked the 44 required for a majority. A Liberal Democrat-led coalition with independents formed the administration.

By late October five councillors had quit Reform, including figures who had held group leadership positions. ITV reported the group falling to 23 seats; Cornwall Council's official breakdown, updated 21 May 2026, recorded 21 Reform members.

Because Reform was in opposition, the losses did not bring down an administration. They reduced opposition strength, forced leadership replacement and narrowed the pool available for committee and scrutiny work. Several departing councillors explicitly linked their decision to tension between national party priorities and cooperative local government.

5. Kent: Numerical Resilience Can Mask Organisational Friction

Kent began Reform control with 57 of 81 seats, a majority large enough to absorb significant attrition without threatening immediate control.

Committee records nevertheless show replacement activity: November 2025 Scrutiny Committee minutes recorded James Defriend joining to fill a Reform vacancy. Kent also reorganised committees in December 2025 and reshuffled Cabinet portfolios in March and May 2026. Not all those changes were caused by disciplinary churn, and the report does not claim they were.

Kent therefore provides a useful counterweight to Staffordshire: large-majority government can be politically turbulent while remaining numerically stable.

6. Cabinet Churn Is More Important Than Councillor Churn

Replacing an executive portfolio-holder is more consequential than replacing a backbencher because cabinet members accumulate policy knowledge, officer relationships and responsibility for major budgets.

Kent's 2026 Cabinet changes illustrate normal executive turnover. There is no basis to classify every reshuffle as disciplinary attrition. The methodological point is that even ordinary turnover carries handover costs; disciplinary or factional turnover adds political pressure to the same process.

7. Committee Vacancies and Democratic Scrutiny

Planning, audit, scrutiny, pensions, licensing and health oversight are substantive democratic functions. Party changes can require recalculation of political proportionality, substitutions or temporary vacancies.

A single vacancy is routine. Repeated turnover can reduce continuity and place more committee work on a smaller pool of experienced councillors. The attrition dataset should therefore record committee and executive offices held at the date of every event.

8. By-Elections Are the Cleanest External Verdict

Internal suspension and expulsion decisions are controlled by the party. A by-election returns the question to voters, making the outcome especially useful evidence.

Rayleigh West is therefore more informative than Prior's resignation alone: Reform did not merely lose a councillor administratively; it failed to retain the seat when voters were given another choice. Future versions of the event dataset should link every seat resignation to the subsequent by-election result.

9. Majority Size Determines Resilience

The institutional effect of attrition depends on arithmetic. A party with a commanding majority can lose several councillors and still govern comfortably; in a no-overall-control authority, one or two departures can change coalition or minority-administration viability.

A national percentage of councillors lost therefore tells us little about governing stability unless each event is mapped onto the majority in that authority at that date. The dataset should maintain a rolling control margin.

10. Does Churn Damage Services?

The evidence is currently insufficient to claim a direct causal relationship between Reform councillor attrition and deterioration in statutory services.

Service outcomes depend on funding, demand, workforce capacity, contracts and national policy as well as political leadership. Temporal sequence alone is not causation. What can be measured immediately is governance friction: leadership vacancies, portfolio transfers, committee substitutions, by-elections and changes in political proportionality.

CAUSATION RULE

Do not infer service failure from political churn merely because one follows the other. A causal claim should require a plausible mechanism plus supporting evidence - for example, documented delay to a decision, repeated loss of portfolio leadership, an audit finding, officer evidence or a measurable break in performance.

11. A Governance-Disruption Scale

- 0 - Status only: temporary party suspension with no office change.
- 1 - Minor: backbench departure; immediate replacement available.
- 2 - Moderate: committee chair/vice-chair loss or repeated committee vacancies.
- 3 - Significant: council-seat resignation or cabinet portfolio change.
- 4 - Major: leader/deputy leader departure or materially narrowed majority.
- 5 - Control event: loss of majority, administration collapse or statutory decision blocked.

This is a research classification, not a moral ranking. Its purpose is to prevent ten trivial suspensions from automatically appearing more consequential than one council-leader resignation.

12. What the Evidence Supports

- Councillor churn has produced real institutional consequences in some Reform-led authorities, but severity varies sharply by role and majority size.
- Staffordshire’s leadership change required an acting leader, formal replacement and Cabinet portfolio reassignment.
- Stuart Prior’s Essex resignation triggered a by-election that Reform lost to the Conservatives, reducing county representation from 53 to 52.
- Cornwall’s departures materially reduced Reform’s group strength and forced opposition leadership changes, although Reform had not formed the administration.
- Kent’s large majority has provided substantial numerical resilience despite political and disciplinary turbulence.
- There is not yet sufficient evidence to attribute deterioration in statutory services directly to Reform councillor attrition.
- The full dataset should record office held, control margin, vacancy/by-election outcome and governance-disruption class for every event.

13. What the Evidence Does Not Support

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying every Reform suspension destabilises a council; that losing

a councillor always means losing a council seat; that Staffordshire stopped functioning when Ian Cooper resigned; that Cornwall's departures brought down a Reform administration; that Kent's Cabinet reshuffles were all caused by disciplinary problems; or that councillor churn has already been proven to damage frontline services.

The Central Institutional Question

"How much political churn can a rapidly expanded governing party absorb before replacement becomes disruption - and at what point does disruption begin to affect the quality of decisions rather than merely the names making them?"

Power Inside Reform: Governance, Membership and Leadership Control

4.7 Governance Scorecard: Is Reform Institutionally Ready for National Government?

EVIDENCE SUMMARY

Purpose: Synthesize Sections 4.1–4.6 into a transparent assessment of Reform UK's institutional readiness for national government. This is not a prediction of election results or a judgement on whether voters should support the party. It asks a narrower question: how much evidence currently exists that Reform has converted rapid political growth into durable systems of internal accountability, candidate assurance, disciplined personnel management and competent administration?

Overall assessment: MIXED / NOT YET DEMONSTRATED. Reform has made real organisational advances: a formal constitution, elected Party Board members, expanding branches, a shadow-cabinet structure and substantial experience running local authorities. Those are meaningful changes from its earlier start-up model. But the evidence also shows persistent concentration of authority at the centre, repeated candidate and councillor assurance failures, leadership and disciplinary churn, and only a short record of executive government. Local councils demonstrate that Reform can keep administrations functioning; they do not yet demonstrate that the party has built a national-government machine capable of reliably staffing and coordinating the state.

Publication rule: "Not yet demonstrated" is not the same as "incapable". The evidence supports a readiness gap, not a claim that failure in national office is inevitable.

Executive Verdict

Reform UK is no longer accurately described simply as a protest vehicle. It has MPs, a formal shadow team, a national branch network, a constitution with elected Board positions and extensive local-government representation. Any assessment that ignores that institutional development would be outdated.

Equally, growth is not the same as institutional maturity. The central test is whether the organisation can repeatedly select suitable people, distribute authority, resolve disputes predictably, retain experienced office-holders, produce implementable policy and govern under legal and fiscal constraints.

The evidence assembled in Part IV produces a deliberately qualified answer. Reform has crossed the threshold from campaigning organisation to governing party in parts of local government, but

several of the systems required for national administration remain either immature, highly centralised or insufficiently tested.

The strongest evidence in Reform's favour is practical: its councils have continued to set lawful budgets, make executive decisions and deliver statutory services despite political turbulence. The strongest evidence against a confident national-readiness claim is organisational: repeated vetting problems and councillor churn have continued even after procedures were tightened, while key constitutional powers remain concentrated around the leader and central Board.

The appropriate conclusion in August 2026 is therefore not "Reform cannot govern". It is that the proposition "Reform is ready to govern the United Kingdom" remains substantially ahead of the available evidence.

1. The Scorecard Method

Each domain is assessed against evidence already examined in Part IV. Scores are not polling estimates and are not intended to create false mathematical precision. They are a compact way of separating demonstrated institutional capacity from aspiration.

Domain	Assessment	Evidence-based rationale
Internal democracy & accountability	2 / 5 — Developing	Formal constitution, member-elected Board seats and branch structures are real advances. Counterweight: high thresholds and central powers limit the practical ability of members to constrain leadership.
Leadership distribution & succession	2 / 5 — Vulnerable	A wider senior team now exists, but authority remains unusually leader-centred and national succession has not been tested under governing conditions.
Candidate & office-holder assurance	1 / 5 — Weak	Repeated withdrawals, suspensions and post-election discoveries show that screening has not yet produced consistently reliable personnel assurance.

Domain	Assessment	Evidence-based rationale
Discipline & due process	2 / 5 — Developing	Formal rules and investigations exist, including reinstatement where appropriate, but repeated cases and contested disciplinary episodes indicate continuing strain.
Local executive competence	3 / 5 — Partly demonstrated	Reform administrations have set budgets, maintained statutory government and made savings decisions. Evidence is still short-term and often mixed with inherited programmes and structural pressures.
Financial realism	3 / 5 — Partly demonstrated	Council experience has forced engagement with statutory spending, reserves, tax and capital/revenue distinctions. This is useful evidence of adaptation, though national fiscal promises are a much larger test.
Organisational resilience	2 / 5 — Developing	Large majorities have absorbed churn and services have continued, but leadership changes, vacancies and by-elections expose avoidable organisational costs.
National governing infrastructure	2 / 5 — Emerging	Shadow portfolios and policy preparation are expanding, but a shadow structure is not equivalent to a tested ministerial, legislative and implementation apparatus.

Indicative composite: 17 / 40. This should be read as “institutional development is visible, but national readiness is not yet demonstrated”, not as a scientific probability of success or failure.

2. Internal Democracy: Reform Has Changed, but Power Remains Concentrated

The current constitution is a genuine institutional improvement on Reform's earlier ownership model. It identifies the party as both an Electoral Commission-registered political party and a company, establishes a Party Board, provides for branches and gives members elected representation on the Board.

Reform has subsequently held a party-wide ballot for three elected Board members. That matters because it creates a formal route for ordinary members into the party's principal management and administrative authority.

But democratisation should be measured by the practical distribution of power, not by the existence of elections alone. Earlier analysis in this report identified extensive powers retained by the leader and Board, including central control over important appointments, rules and party direction. The constitution also permits substantial Board authority to be exercised between meetings through the leader, subject to its terms and later governance processes.

The result is not "no democracy". It is a hybrid structure: more member participation than Reform's original company-controlled model, but with unusually strong central leadership safeguards. That may reduce factionalism; it also reduces the number of independent institutional checks on the leader.

SCORECARD JUDGEMENT

Credit Reform for genuine constitutional reform. Do not describe it as member-owned in a way that implies ordinary members exercise day-to-day control. The evidence supports "democratised, but still strongly centralised".

3. Leadership Depth: A Shadow Cabinet Helps, but Titles Are Not Capacity

Reform's creation of a broader shadow team is another sign of maturation. It distributes policy presentation across named figures rather than requiring Nigel Farage to front every portfolio.

However, institutional depth depends on what sits behind the titles: policy teams, legislative drafting, implementation planning, relationships with the civil service, parliamentary scrutiny experience and credible substitutes when senior figures leave.

Zia Yusuf's appointment as Shadow Home Secretary illustrates the distinction. Reform is entitled to give a party spokesperson that title, but Yusuf is not an elected MP. He therefore cannot perform the Commons functions normally associated with an opposition frontbencher: questioning ministers from the chamber as an MP, voting on legislation or serving as a parliamentary office-holder by virtue of that shadow title.

Reform says it is preparing thousands of pages of legislation for a first year in office. That is a testable claim of preparation, but publication or independent examination of the legislative package will be required before the report can treat its scale, quality or implementability as demonstrated.

4. Candidate Assurance Remains the Clearest Readiness Warning

A national governing party needs hundreds of candidates and thousands of councillors, advisers and office-holders. The relevant standard is therefore not whether any scandal occurs — every large party experiences candidate failures — but whether the system identifies predictable risks before voters confer office.

Reform's 2024 general-election experience exposed serious vetting weaknesses. The party subsequently strengthened its procedures. By 2026, Reuters reported additional central checks, including Experian screening and mock media interviews for some candidates.

Yet the problem did not disappear. Reuters reported that 15 candidates announced for the 2026 Scottish and Welsh elections withdrew after racist or derogatory material resurfaced, disputes with the party or administrative errors. Staffordshire later provided a particularly significant local-government example: council leader Ian Cooper's membership was revoked following an investigation into undeclared social-media accounts during candidate vetting.

The fair conclusion is therefore not that Reform performs no vetting. It is that the revised system has not yet demonstrated the consistency expected of a party presenting itself as an imminent national government.

WHY THIS DOMAIN WEIGHS HEAVILY

Candidate assurance is a leading indicator of governing capacity because the same organisation must eventually select ministers, parliamentary private secretaries, committee members, advisers and local leaders. Repeated failures impose costs after election, when replacement is harder and voters or institutions bear part of the disruption.

5. Local Government: The Most Important Evidence in Reform's Favour

The strongest corrective to claims that Reform is incapable of administration is the record of its councils. Whatever the political controversies around them, these authorities have continued to perform the basic constitutional acts of government.

Kent approved a lawful 2026/27 budget and a 3.986% council-tax increase. The council allocated £787.5 million to adult social care and £423 million to children's services. These are not the choices of a protest campaign; they are decisions made inside statutory and financial constraints.

Reform administrations have also pursued efficiency programmes, debt reduction, commercial strategies and service changes. Some claimed "savings" require careful classification — especially capital reprofiling and cost avoidance — but other measures are concrete and deserve to be recorded as such.

This experience is institutionally valuable. It teaches councillors that slogans such as eliminating "waste" do not remove the legal obligation to fund social care, SEND, transport, safeguarding and other demand-led services. In that sense, local government is forcing Reform to confront the difference between opposition rhetoric and constrained executive choice.

The limitation is time. Most Reform administrations are still young. One or two budget cycles cannot establish long-run performance, audit quality, service improvement or resilience through a recession or major emergency.

6. Attrition: A Manageable Problem Until It Reaches Key Functions

Sections 4.5 and 4.6 showed why raw resignation totals are inadequate. Large majorities can absorb several departures without losing control; a single leader or cabinet departure can produce much more disruption.

Staffordshire required an acting leader, a later permanent leadership election and Cabinet portfolio reassignment after Ian Cooper left Reform. Essex turned a councillor resignation into a by-election that transferred Rayleigh West to the Conservatives. Cornwall's departures weakened the largest opposition group and forced leadership replacement. Kent, by contrast, has retained control despite substantial political turbulence because its majority was large.

The evidence therefore supports an organisational-resilience concern, not a claim of systemic collapse. Reform administrations have generally continued functioning. The unresolved question is whether repeated churn becomes more costly as the party's responsibilities expand and the pool of experienced replacements is stretched.

7. The Scale Problem: Westminster Is Not a Larger County Council

Local-government experience is relevant to national readiness, but it cannot simply be multiplied upward. Central government operates at a radically different scale and constitutional complexity.

A UK government must simultaneously staff ministerial departments, manage legislation through both Houses, negotiate internationally, oversee defence and national security, respond to markets, administer tax and welfare systems, direct major infrastructure programmes and coordinate a permanent civil service numbering in the hundreds of thousands.

Local councillors can build valuable executive experience, but most do not acquire direct experience of monetary policy, national taxation, treaty obligations, defence procurement, intelligence, macroeconomic forecasting or primary legislation.

This is why the report treats local administration as positive evidence of capacity without treating it as proof of national readiness.

8. What Would Change the Score?

A scorecard should be falsifiable. Reform should be able to improve its assessment through observable institutional performance rather than favourable commentary.

- Candidate assurance would improve if successive large election slates produced materially fewer post-selection withdrawals and post-election disciplinary discoveries.
- Internal-democracy scores would improve if member-elected institutions acquired clearer independent powers and leadership succession could be demonstrated without organisational crisis.
- Local-government competence would strengthen with audited outturns showing sustainable recurring savings, stable reserves, credible capital plans and measurable service outcomes rather than announcements alone.

- National-readiness evidence would strengthen if Reform published sufficiently detailed legislation, implementation plans, costings and delivery structures to permit independent scrutiny before an election.
- Organisational resilience would improve if councillor and leadership attrition stabilised while the party retained experienced office-holders and developed a deeper bench of replacements.

9. What Would Lower the Score?

- Repeated candidate failures after supposedly strengthened vetting.
- Further executive resignations caused by information that reasonable pre-selection checks should have identified.
- Loss of council control through defections or disciplinary churn.
- Audited evidence showing that headline savings were predominantly reclassification, deferral or inherited measures rather than sustainable efficiencies.
- Persistent inability to distinguish national campaigning priorities from the legal duties of local authorities.
- Constitutional or disciplinary decisions that further centralise power without effective independent review.

10. The Strongest Case Reform Can Make

CASE FOR READINESS

Reform can reasonably argue that rapid growth inevitably creates mistakes; that it has responded by tightening vetting and formalising its constitution; that its councils have not collapsed; that they are producing lawful budgets and identifiable efficiencies; that a larger shadow team and legislative preparation show deliberate movement from protest to government; and that established parties also suffer scandals, defections and poor candidate selections.

Those arguments should not be dismissed. Several are supported by evidence in this report. A fair assessment must therefore distinguish “institutionally incomplete” from “uniquely dysfunctional”.

11. The Strongest Case Against Readiness

CASE AGAINST READINESS

The counter-case is that Reform’s expansion has repeatedly outrun its assurance systems; that strong central leadership has not prevented recurring candidate and councillor problems; that local-government achievements are too recent to establish durable performance; that some headline efficiency claims blur recurring savings with capital reprofiling or future cost avoidance; and that a party can possess a shadow cabinet without possessing the personnel depth and implementation machinery required to run Whitehall.

This report finds the counter-case currently carries greater evidential weight on the narrow question of proven national readiness — while recognising that the evidence base can change quickly.

12. Final Part IV Finding

PART IV VERDICT

Reform UK has developed beyond its earlier entrepreneurial, leader-owned model and now possesses genuine elements of a conventional political institution. Its local administrations demonstrate that it can exercise executive authority under real legal and financial constraints.

But national-government readiness requires more than electoral momentum and functioning councils. It requires repeatable candidate assurance, distributed leadership, predictable discipline, policy implementation capacity, institutional memory and resilience when senior personnel fail. Across those measures, the evidence remains uneven.

Accordingly, Part IV finds that Reform has demonstrated an ability to enter government, but has not yet demonstrated institutional readiness to govern the United Kingdom at national scale. That conclusion is provisional and should be retested against audited council outcomes, future election vetting, leadership stability and published implementation plans.

13. Evidence Status at 9 August 2026

- DEMONSTRATED: Reform has formalised its constitution and expanded member participation in party governance.
- DEMONSTRATED: Reform-controlled councils can set budgets and continue statutory administration despite political churn.
- DEMONSTRATED: candidate/councillor assurance failures have continued after earlier vetting reforms.
- DEMONSTRATED: some churn has produced measurable governance consequences including leadership succession, portfolio reassignment and a lost by-election.
- PARTLY DEMONSTRATED: council efficiency measures include genuine savings, but headline totals can mix different financial categories.
- NOT YET DEMONSTRATED: sustained improvement in frontline services attributable to Reform administration.
- NOT YET DEMONSTRATED: a sufficiently tested national personnel and implementation system capable of supporting government at Whitehall scale.
- OPEN QUESTION: whether rapid organisational professionalisation will outpace the risks created by equally rapid electoral expansion.

PART IV COMPLETE

Sections 4.1–4.7 now form a complete governance sequence: formal power -> constitutional structure -> discipline and candidate assurance -> local executive performance -> councillor attrition -> institutional consequences -> national-readiness synthesis. The next stage should move to Part V rather than extending the scorecard with further anecdotal cases. Part IV can then be refreshed when audited 2026/27 council outturns and new councillor-event data become available.

SOURCE NOTE — Detailed Part IV source registers and research-priority material are available in the Evidence & Sources Compendium. Core governance evidence, case studies and the Part IV scorecard remain in the main report.

PART V
Policy Feasibility: From Political Promise To Practical Delivery

5.1 From Promise to Statute: A Policy Feasibility Audit

WHY PART V CHANGES THE TEST

Part IV asked whether Reform UK has built an organisation capable of governing. Part V asks a different question: if a Reform government attempted to implement its headline programme, what would actually have to happen inside Parliament, Whitehall, the courts, public bodies and international relationships?

The standard is deliberately neutral. A policy is not infeasible merely because it is radical, controversial or requires repeal of existing law. Parliamentary sovereignty gives a government with sufficient Commons support substantial legislative power. But legislation is only one layer of delivery. Treaties, devolved settlements, operational capacity, procurement, courts, civil-service systems, diplomatic cooperation, transition costs and physical infrastructure can determine whether a statutory power becomes a real-world outcome.

PART V COMMON DELIVERY BASELINE

The feasibility tests in Part V repeatedly encounter the same delivery chain. To avoid rebuilding that chain in every section, the baseline below applies throughout Part V. Later sections should identify only what changes the baseline or adds a distinct constraint.

Dependency	What must exist	Why legislation alone is insufficient	Evidence required for readiness
Legal authority	Lawful powers, procedures and review routes	New powers still require compliant decisions and case handling	Draft law, legal analysis and operating guidance
Casework & identity	Decisions, identity verification, documentation and appeals handling	A removal target cannot exceed sustainable case throughput	Workforce model, productivity assumptions and backlog/ramp-up plan
Detention estate	Usable secure places with	A statutory detention power	Estate plan, procurement

	healthcare, security and management	does not create beds or sites	route, staffing and opening timetable
Transport & removals	Escorts, ground transport, charter/scheduled flight capacity	Flights require people to be legally and practically removable	Flight assumptions, escort capacity and operational schedule
Receiving states	Travel documents, acceptance and return arrangements	UK law cannot compel another sovereign state to receive a person	Country-by-country agreements and acceptance assumptions
Maritime operations	Vessels, crews, lawful interception/disembarkation procedures	Domestic authority cannot remove territorial/diplomatic constraints	Operational concept, legal basis and required foreign consent
Finance & procurement	Capital, operating budgets, contracts and suppliers	Headline funding does not eliminate lead times or market capacity	Costed delivery model, contracts strategy and contingencies
Critical path	Dependencies sequenced in achievable order	The slowest prerequisite can determine overall throughput	Milestones, owners, risks and sensitivity scenarios

PART V EVIDENTIAL RULE — A constraint is not treated as proof that a policy is impossible. The test is whether the published plan identifies the constraint, quantifies it where possible and provides a credible route through it. Where a later section relies on the common baseline, it should cross-reference this table rather than repeat the full explanation.

Executive Brief

Reform increasingly presents itself not merely as a party with aspirations but as a government-in-waiting. Zia Yusuf said in June 2026 that the party had "thousands of pages of primary legislation ready to go" in its first year. That claim raises the evidential bar: detailed legislative preparation should make it possible to test not only objectives but mechanisms, sequencing and dependencies.

This Part will not ask whether the author agrees with a policy. It will ask whether the stated outcome follows from the legal and administrative mechanism Reform proposes, on the timetable and cost claimed.

The opening case study is immigration because Reform itself places border control, withdrawal from the ECHR, mass deportation and Operation Restoring Justice at the centre of its programme. The policy is unusually useful analytically because it combines primary legislation, treaty withdrawal, detention construction, enforcement recruitment, data integration, aviation capacity and bilateral return agreements.

The central distinction is between legal authority and delivery capacity. Parliament can repeal the Human Rights Act. The UK can give notice of withdrawal from the ECHR. Parliament can create new detention and removal powers. None of those acts, by themselves, supplies detention beds, aircraft, escorts, travel documents or another state willing to receive a person.

The same framework will subsequently be applied to taxation, NHS/private-healthcare proposals, welfare, energy/net zero, equality law, policing and criminal justice. This prevents the report from

changing its evidential standard according to whether a policy is politically attractive or objectionable.

1. The Eight-Layer Policy Test

Layer	Question	Evidence standard
1 — Stated outcome	What does Reform actually promise?	Use the party's current policy text, manifesto or senior authorised statement.
2 — Legal mechanism	What legislation must be enacted, repealed or amended?	Identify primary legislation, secondary legislation, treaty obligations and devolved competence.
3 — Operational mechanism	Which body physically delivers it?	Home Office, NHS, HMRC, police, councils, regulators, courts, contractors or new agency.
4 — Capacity	Does the required staff, estate, technology and supply chain exist?	Quantify current baseline and proposed expansion.
5 — External dependencies	Can another actor refuse or delay delivery?	Foreign states, courts, devolved governments, local authorities, suppliers or regulated industries.
6 — Fiscal model	What is expenditure, revenue, cost avoidance and transition cost?	Separate gross cost, net cost, claimed savings and timing.
7 — Timetable	Can the dependencies occur in the order required?	Include legislation, notice periods, procurement, construction, recruitment and litigation.
8 — Outcome test	What observable evidence would prove success?	Predefine measurable indicators rather than rely on political announcement.

CORE RULE

A policy can be legally possible but operationally implausible; operationally possible but fiscally misdescribed; fiscally affordable but dependent on foreign cooperation; or achievable in principle but not on the promised timetable. “Possible” and “deliverable as stated” are different findings.

2. Case Study: Operation Restoring Justice

Reform’s current policy platform describes Operation Restoring Justice as a five-year emergency programme to identify, detain and deport illegal migrants. It proposes leaving the ECHR, repealing the Human Rights Act, passing an Illegal Migration (Mass Deportation) Bill, establishing a UK Deportation Command, constructing Secure Immigration Removal Centres with capacity for up to 24,000 people, negotiating return agreements and chartering up to five deportation flights per day. Reform claims the programme would produce a £42bn net saving over ten years, including £7bn during the first Parliament.

Reuters reported in March 2026 that Reform’s stated ambition was deportation of up to 600,000 asylum seekers over five years. The scale is therefore not comparable with incremental reform of the existing returns system; it is a proposed industrial expansion of immigration enforcement.

On 3 August 2026 Reform added Operation Fortress, promising military interception of Channel boats and return to France, with Farage saying crossings would cease within a fortnight. That introduces a further dependency: French consent to receiving people intercepted or returned across an international maritime border.

3. Start With the Existing Baseline

The Home Office recorded 39,007 returns in the year ending March 2026. Approximately three-quarters were voluntary and one-quarter enforced. Asylum-related returns numbered 11,918 — the highest in the statistical series beginning in 2010.

This distinction matters because “returns” are not synonymous with mass forced deportation. A system capable of recording 39,000 total returns is not necessarily a system capable of physically enforcing hundreds of thousands of removals.

The Home Office also reports that 95% of small-boat arrivals since 2018 claimed asylum. Of those arrivals whose claims had received an initial substantive decision by the relevant cut-off, 79,589 had been granted asylum or another protection status and 53,305 refused. A policy treating method of entry as automatically determining removability would therefore require a fundamental change to the existing asylum framework, not merely faster enforcement.

The current government is itself expanding detention capacity: a June 2026 announcement described a 40% increase and linked new capacity at Haslar and Campsfield to more than 45,000 removals over a decade. Reform’s proposed 24,000-place estate is therefore an expansion on a radically different scale.

BASELINE WARNING

Do not compare Reform's proposed "600,000 deportations" directly with the Home Office's 39,007 annual "returns". The latter includes voluntary departures and categories outside Reform's proposed mass enforced-removal operation. A valid capacity comparison must isolate enforced removals, asylum-related removals and the population legally removable at each stage.

4. Leaving the ECHR Is a Process, Not a Switch

Reform states that it would "immediately" leave the European Convention on Human Rights. The UK can withdraw, but Article 58 of the Convention requires six months' notice to the Secretary General of the Council of Europe. Withdrawal therefore cannot become legally effective on the first day of a Reform government simply by ministerial declaration.

Repealing the Human Rights Act is a separate domestic legislative act. The Act gives Convention rights effect in UK courts; repealing it would not itself terminate the UK's international treaty obligations while the Convention remained in force.

The distinction is central to sequencing. A government could introduce Human Rights Act repeal legislation immediately and give ECHR notice immediately, but the legal effects occur through different mechanisms and on different timetables.

The House of Commons Library also identifies wider constitutional relationships in which ECHR membership or Convention rights are embedded, including the Belfast/Good Friday Agreement, the UK-EU Trade and Cooperation Agreement and devolution arrangements. Withdrawal would therefore create legal and diplomatic consequences beyond immigration law.

5. The Refugee Convention Adds Another Clock

Reform's programme also contemplates withdrawing from or disapplying international obligations that prevent its removal policy. The Refugee Convention cannot simply be wished away domestically: the Convention's withdrawal provision requires written notification and takes effect one year after receipt.

Parliament could legislate contrary to an international obligation as a matter of domestic law if it used sufficiently clear language; the UK's constitutional system is dualist and Parliament remains sovereign. But doing so does not erase the international-law consequence of breaching a treaty while the UK remains bound by it.

This produces a practical first-year sequencing problem for any promise that assumes all relevant treaty constraints disappear immediately.

IMPORTANT LEGAL DISTINCTION

"Parliament can pass the law" does not necessarily mean "the UK has ceased to be internationally bound". Domestic enforceability, international responsibility and treaty withdrawal are separate questions.

6. Leaving the ECHR Does Not Remove Every Non-Refoulement Constraint

Withdrawal from the ECHR would remove one major route through which removals are challenged, but it would not automatically create a legal power to send every person to any destination.

The UN Convention against Torture contains its own non-refoulement obligation: a state party must not expel, return or extradite a person where substantial grounds exist for believing they would be in danger of torture. The UN Committee against Torture describes that obligation as absolute and applies it to pushback operations as well as conventional deportation.

The Commons Library similarly notes that obligations relevant to removal also appear in other UN treaties and customary international law. A complete legal feasibility audit must therefore identify every constraint Reform proposes to leave, amend, disapply or continue to honour rather than treating “leave the ECHR” as a universal removal power.

7. A Deportation Order Does Not Create a Destination

The operational bottleneck is frequently not the existence of a domestic removal power but obtaining documentation and acceptance from a receiving country.

The Home Office maintains a country returns guide precisely because return requirements differ by destination and depend upon travel documents and administrative processes. The current government has also used visa pressure against countries it says were refusing to cooperate with returns.

Reform says the Foreign Office would make return agreements a priority and has discussed agreements with states including Afghanistan and Eritrea. That is a policy intention, not an outcome under unilateral UK control. A foreign government can demand proof of nationality, delay documents, impose conditions or refuse a proposed arrangement.

Third-country arrangements create the same dependency in another form: the UK would need a state willing to accept people who may not be its nationals, together with a lawful, durable and financially specified agreement.

THE SOVEREIGNTY PARADOX

A policy framed as restoring British sovereignty can still depend decisively on the sovereign choices of other states. Parliament can order the Home Office to pursue a removal; it cannot legislate France, Afghanistan, Eritrea or a third country into accepting that person.

8. France and Operation Fortress

The August 2026 Operation Fortress announcement sharpens that problem. Reform proposes interception and return of small boats to France and says the boats could be stopped within a fortnight.

Reuters reported the central operational objection: the UK cannot simply move warships into French territorial waters, seize boats or disembark passengers in Calais without French permission. Returning a person to French territory is therefore not a unilateral consequence of deploying the Royal Navy.

The existing UK-France arrangement demonstrates what lawful return cooperation looks like. Between the start of operational delivery in August 2025 and 30 June 2026, 1,087 people were returned from the UK to France while 1,117 were transferred into the UK through the reciprocal legal route. Whatever one thinks of its scale, the mechanism exists because France agreed to it.

A feasibility assessment of Operation Fortress must therefore separate maritime interception capacity from readmission authority. The first may be supplied by UK assets; the second requires a legal basis and cooperation at the destination.

9. The 24,000-Bed Detention Estate

Reform proposes Secure Immigration Removal Centres with capacity for up to 24,000 detainees. Reuters reported Farage's earlier estimate of £2.5bn for holding facilities on military air bases.

The estate is not simply a construction project. A 24,000-place detention system requires land, planning or emergency statutory powers, secure accommodation, healthcare, food, transport, custody staff, interpreters, legal access, safeguarding, caseworking, security, maintenance and removal logistics.

Turnover matters as much as bed count. If removals are delayed because travel documents or receiving-country consent are unavailable, detention places remain occupied and throughput falls. If five flights a day are promised, the detention estate, caseworking and aviation schedule must all feed the same pipeline.

This is exactly why Part V will distinguish nominal capacity from throughput. Twenty-four thousand beds do not equal 24,000 deportations per day, month or year.

10. Five Flights a Day: Work Backwards From the Aircraft

Reform's current policy says the Home Office would charter up to five deportation flights per day, with an RAF Voyager held on six-hour hot-spare readiness.

The number of flights alone does not establish removal capacity. The relevant variables include seats available after escorts and security requirements, destination mix, flight duration, landing permissions, airport slots, escort-to-detainee ratios, failed removals, medical requirements and whether destination authorities accept arrivals at the proposed frequency.

At five flights every day, the programme implies up to 1,825 charter operations a year before cancellations or scheduling constraints. That is an aviation, procurement and staffing programme in its own right.

The report should therefore require Reform's eventual legislation or implementation papers to disclose the assumed average number of removals per flight. Without that denominator, the headline flight count cannot be reconciled with the claimed five-year deportation total.

11. The Arithmetic Test

A target of 600,000 removals over five years averages 120,000 per year, 10,000 per month or approximately 329 per day if activity occurred every day of the year.

If five removal flights operated every day, the simple arithmetic would require an average of roughly 66 completed removals per flight to deliver 600,000 removals in five years solely through those flights. That is not inherently impossible as aircraft capacity; it is merely the minimum throughput

implied by the headline numbers before failed removals, non-flying days, long-haul scheduling and other operational friction are considered.

Compared with 11,918 asylum-related returns in the year ending March 2026, 120,000 annual removals would be roughly ten times that current asylum-related returns volume. Compared with total returns of all types, it would be just over three times the current annual total — but that comparison understates the challenge because most current returns are voluntary.

The relevant implementation question is therefore not whether an aircraft can carry 66 people. It is whether the system can produce hundreds of legally and diplomatically executable removal cases every day for five years.

Measure	Value	Interpretation
Five-year target	600,000	Reform/Reuters reported ambition
Average per year	120,000	600,000 ÷ 5
Average per month	10,000	120,000 ÷ 12
Average per calendar day	~329	600,000 ÷ 1,825 days
Maximum flights at five/day	9,125	5 × 365 × 5
Average removals per flight	~66	600,000 ÷ 9,125
YE Mar 2026 asylum-related returns	11,918	Home Office
Required annual multiple vs asylum-related baseline	~10.1×	120,000 ÷ 11,918

12. The Cost Claim Needs a Reconciliation

Reform's current website claims Operation Restoring Justice would generate a £42bn net taxpayer saving over ten years and £7bn during the first Parliament. Earlier reporting of the 2025 launch described a £10bn five-year programme cost, while Farage separately cited £2.5bn for detention infrastructure.

Those numbers may be reconcilable if Reform's model includes avoided asylum accommodation, support and other future expenditure exceeding implementation costs. But a net saving is not the same as a cheap programme. The gross enforcement cost must be disclosed before the net figure can be evaluated.

Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.

Part V will therefore treat Reform's £42bn as a claim to be audited, not as either established fact or an inherently impossible number.

FISCAL TEST
Every major Reform savings claim can be tested by decomposing it into gross implementation cost + transition cost + recurring operating cost + payments/transfers + avoided expenditure + new revenue = claimed net fiscal effect. Where the underlying model is unavailable, the net claim cannot yet be independently reproduced.

13. Data Fusion and the Administrative State

Reform's plan is not only a border policy. Reporting on the 2025 launch described a new enforcement system intended to combine data from bodies including the Home Office, NHS, HMRC, DVLA, banks and police, alongside expanded biometric identification.

That creates a substantial machinery-of-government project: statutory data-sharing gateways, information-security architecture, matching accuracy, audit trails, access controls, redress for mistaken identity and operational agreements across organisations with different legal purposes.

Ironically, a government promising a smaller state would require a significantly more integrated enforcement state to identify hundreds of thousands of people at the proposed scale. That is not necessarily a contradiction — governments can shrink one function while expanding another — but the staffing and technology costs belong in the fiscal model.

14. Parliament Is Powerful, But Time Is Finite

A Reform majority government could introduce emergency primary legislation quickly. Parliamentary sovereignty means the courts generally cannot strike down an Act of Parliament merely because they disagree with its policy.

But a first-year legislative programme still requires drafting, introduction, Commons and Lords stages, consideration of amendments, commencement provisions, secondary legislation and implementation guidance. A government can use programme motions and political pressure to accelerate passage, but legislative speed does not construct detention centres or negotiate treaties.

Yusuf's claim that thousands of pages of primary legislation are already being prepared is therefore highly relevant. If Reform publishes those texts, they should become the primary evidence for later versions of this report rather than relying on speeches or policy summaries.

15. A First-Year Critical Path

Period	Required action	Feasibility issue
Day 1–30	Give ECHR withdrawal notice; introduce HRA repeal / immigration legislation; establish programme governance	Legislation can begin immediately; ECHR withdrawal not yet effective
Months 1–6	Recruit/expand Deportation Command; procure estate and aviation; negotiate returns; build data-sharing systems	Parallel workstreams; foreign agreements remain external dependency
Month 6+	ECHR denunciation can take effect after Article 58 notice period	Other treaty/non-refoulement constraints remain
Year 1	Refugee Convention withdrawal still within one-year notice period if notice given at outset	Any domestic disapplication before withdrawal raises international-law issue
Year 1 onward	Scale detention throughput and removal flights	Depends on beds, caseworkers, documentation, destinations and escorts
Years 1–5	Sustain average ~120,000 removals annually to reach 600,000	Requires continuous throughput at multiples of current asylum-related return volume

16. Preliminary Feasibility Verdict

Policy component	Assessment	Reason
Parliamentary power to legislate	HIGH	A majority government can repeal and enact extensive domestic immigration law.
Immediate ECHR exit	LOW as stated	Withdrawal is legally available but Article 58 requires six months' notice.

Policy component	Assessment	Reason
Immediate removal of all treaty constraints	LOW	Other treaties and international-law obligations require separate analysis/withdrawal.
Creation of Deportation Command	HIGH in principle	Government can establish/reorganise an enforcement body; scale and recruitment are delivery questions.
24,000 detention places	POSSIBLE but unproven on timetable/cost	Requires major estate, staffing, procurement and operating programme.
Five flights per day	POSSIBLE as an aviation target; system throughput unproven	Flights are only the final stage of a case pipeline.
600,000 removals in five years	NOT YET DEMONSTRATED	Requires ~120,000 annually and unprecedented sustained case/diplomatic throughput.
Unilateral return to France	LOW without French agreement	UK assets do not create French readmission consent.
£42bn ten-year net saving	NOT YET REPRODUCIBLE	Requires publication of underlying gross-cost and avoided-cost model.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying that Reform's deportation programme is legally impossible in every form; that Parliament is powerless to change the current asylum framework; that leaving the ECHR would have no effect; that every person arriving by small boat is a failed asylum seeker; that 24,000 detention beds automatically produce 24,000 removals; that France would be legally compelled to accept unilateral UK returns; or that the £42bn claimed saving has already been independently validated.

Policy Feasibility: From Political Promise To Practical Delivery

5.2 The £42 Billion Question: Costing Mass Deportation

EVIDENCE SUMMARY

Purpose: Reconstruct the fiscal logic behind Reform UK's claim that Operation Restoring Justice would produce a £42 billion net taxpayer saving over ten years, including £7 billion during its first Parliament.

Finding: Reform has published a headline implementation cost of approximately £10 billion over five years, but the publicly reported component figures do not yet amount to a reproducible whole-programme model. The strongest official benchmark now available is the Home Office's March 2026 estimate that an enforced return cost an average £48,800 in 2024/25. Applied mechanically to 600,000 enforced returns, that benchmark alone produces £29.3 billion — before asking whether unprecedented scale lowers or raises unit costs. Voluntary return is dramatically cheaper, but Reform's political promise is not a 600,000-person voluntary-return programme.

Conclusion: The £42 billion claim is not disproved by one comparator, because a mass programme could change unit costs and could avoid future asylum-support expenditure. But on the evidence currently published, the claimed net saving cannot be independently reproduced. The missing variables — return mix, detention occupancy, capital cost, diplomatic payments, legal/casework cost, destination availability and the population actually receiving taxpayer-funded support — are too consequential to treat the £42 billion figure as established.

Executive Brief

Reform's current national policy page states that Operation Restoring Justice would build detention capacity for up to 24,000 people, charter up to five deportation flights per day and deliver a £42bn net saving over ten years, including £7bn during the first Parliament.

Contemporary reporting of Reform's launch put gross implementation cost at approximately £10bn over five years. The reported breakdown was £2bn for detention-centre construction, £2bn for detention, £1.5bn for staff, £1.5bn for charter flights and £2bn for diplomatic incentives. Those identified categories total £9bn, leaving approximately £1bn not explained by that public breakdown.

The Home Office has since published a particularly important comparator: in 2024/25 the estimated average cost of an enforced Immigration Enforcement return was £48,800, compared with £4,300 for a voluntary return. The enforced figure includes casework/logistics, detention, escorting and flights.

At the current enforced-return unit cost, 600,000 removals would cost about £29.3bn. A 75% enforced / 25% voluntary mix would cost about £22.6bn; a 50/50 mix about £15.9bn; and an entirely voluntary programme about £2.6bn. These are benchmarks, not forecasts: Reform proposes a system radically larger than the current one and claims economies and legal changes would alter the cost structure.

Reform's £1.5bn flight budget equates to £2,500 for each of 600,000 removals if spread across the full target. By contrast, the National Audit Office recorded a Home Office planning assumption of approximately £11,000 per person for flights to Rwanda alone, excluding much of the wider return machinery. Destination and charter economics differ, but the gap is large enough to require explanation.

The savings side is equally sensitive. At March 2026, 97,519 people were receiving asylum support, including 20,885 in hotels and 72,768 in other accommodation. Reform's proposed removal population is therefore much larger than the population currently generating asylum-accommodation costs. It is not methodologically valid to multiply 600,000 by a hotel or asylum-support unit cost and call the result a taxpayer saving.

The £42bn figure could only be reproduced credibly through a cohort model showing who would otherwise receive which public support, for how long, and what removal costs would replace that spending. Reform has not yet published enough of that model for independent replication.

1. Start With Reform's Own Numbers

The correct starting point is Reform's own published claim, not a hostile counter-estimate.

The party says the five-year emergency programme will identify, detain and deport people it classifies as illegal migrants; create a UK Deportation Command; expand secure removal-centre capacity to 24,000; negotiate return agreements; and operate up to five deportation flights a day.

Its current policy page gives the bottom line: £42bn net saving over ten years and £7bn during the first Parliament.

A Reform local-party publication reproducing Operation Restoring Justice adds two assumptions not stated on the shorter national policy page: gross implementation cost of approximately £10bn over five years and a claim that the current system costs more than £7bn per year.

Contemporary reporting at launch gave a more detailed £10bn description: £2bn construction, £2bn detention operations, £1.5bn staffing, £1.5bn charter flights and £2bn diplomatic incentives. Those disclosed components sum to £9bn, not £10bn. That may simply mean a further category or contingency was omitted from reporting, but a publication-grade costing should identify it.

Component	Amount	Status
Detention-centre construction	£2.0bn	Reported Reform allocation
Detention operating costs	£2.0bn	Reported Reform allocation
Staff	£1.5bn	Reported Reform allocation
Charter flights	£1.5bn	Reported Reform allocation
Diplomatic incentives / return deals	£2.0bn	Reported Reform allocation
Unspecified difference to stated £10bn total	~£1.0bn	Not identifiable from public breakdown reviewed
Stated five-year gross programme cost	~£10.0bn	Reform / launch reporting

FIRST ACCOUNTING QUESTION

Before debating whether £10bn is too high or too low, the published model needs to reconcile its own components. A £42bn net-savings claim should be auditable from a table showing gross costs, gross avoided expenditure, timing, inflation/discounting assumptions and the treatment of uncertainty.

2. The New Official Benchmark: £48,800 per Enforced Return

In March 2026 the Home Office published an estimate of the average cost of Immigration Enforcement returns in financial year 2024/25.

It estimated £420m of expenditure associated with 8,600 enforced returns, producing an average cost of £48,800 per enforced return. Voluntary returns cost £58m for 13,700 returns, or £4,300 each.

The Home Office methodology is particularly useful because the enforced-return figure is broader than an airline ticket. It incorporates case working and logistics, detention, escorting and flight costs. That is much closer to the operational process Reform would have to scale.

It would be wrong simply to declare £48,800 immutable. A 600,000-person programme might create economies of scale in procurement and charter utilisation. Equally, it could encounter diseconomies as increasingly difficult cases require longer detention, more documentation, escorts, litigation or diplomatic negotiation. The current unit cost is therefore a benchmark around which Reform should explain its alternative assumptions.

Illustrative mix	People	2024/25 unit-cost benchmark	Indicative cost
100% enforced	600,000	£48,800 / enforced return	£29.28bn
75% enforced / 25% voluntary	450,000 + 150,000	£48,800 / £4,300	£22.61bn
50% enforced / 50% voluntary	300,000 + 300,000	£48,800 / £4,300	£15.93bn
25% enforced / 75% voluntary	150,000 + 450,000	£48,800 / £4,300	£9.26bn
100% voluntary	600,000	£4,300 / voluntary return	£2.58bn

DO NOT MISREAD THIS TABLE

£29.28bn is not presented as “the cost of Reform’s plan”. It is what 600,000 enforced returns would cost if the present Home Office average remained unchanged. Its purpose is to expose the assumption Reform must demonstrate: how a programme roughly two orders of magnitude larger than current enforced-return volumes gets from today’s all-in unit cost to a five-year gross budget of about £10bn.

3. What Unit Cost Does Reform’s £10bn Imply?

If the full £10bn five-year programme budget were divided across 600,000 completed removals, the implied average gross programme cost would be approximately £16,667 per completed removal.

That figure includes, in principle, not merely the act of removal but construction of a 24,000-place detention estate, detention operations, staffing, flights and payments used to secure foreign cooperation.

£16,667 is about one-third of the Home Office's current £48,800 average enforced-return cost. It is, however, far above the £4,300 voluntary-return benchmark.

The viability of Reform's budget therefore depends heavily on the proportion of people who leave voluntarily, the speed with which people move through detention, and whether mass chartering and simplified legal processes genuinely reduce casework and escort costs.

4. The £1.5bn Flight Budget

Reform's reported £1.5bn charter-flight allocation is one of the easiest components to stress-test.

Spread over 600,000 removals, £1.5bn provides £2,500 per person for the flight component. That is not necessarily impossible for short-haul high-occupancy charters, but Reform's destination list includes countries far beyond Europe and its plan also contemplates third-country arrangements.

The National Audit Office found that the Home Office expected flights to Rwanda to cost around £11,000 per relocated person, including chartering and fuel. At that unit cost, 600,000 flights would amount to £6.6bn before the separate escorting and wider programme costs identified by the NAO.

Rwanda is not a universal comparator: a flight to Albania or France is cheaper than a specialist long-haul Rwanda charter, and large aircraft operating at high load factors can reduce cost per passenger. But Reform's £2,500 implied allowance needs a route-and-load-factor model rather than assertion.

Benchmark	Calculation	Implication
Reform reported flight budget	£1.5bn / 600,000	£2,500 per removal
NAO Rwanda planning assumption	£11,000 per relocated person	£6.6bn if mechanically applied to 600,000
Current Home Office enforced return	Flights included inside £48,800 all-in average	Not separately comparable without underlying mix

5. Five Flights a Day Is Not the Same as 600,000 Removals

Five flights every day for five years produces approximately 9,125 flight departures.

To remove 600,000 people on those flights would require an average of about 66 completed removals on every flight, every day, across the five-year period.

Current volumes show the scale change. The Home Office recorded 9,700 enforced returns in the year ending March 2026 and 39,000 total enforced and voluntary returns. Reform's 120,000-per-year average target would be more than twelve times current enforced-return volume and more than three times total current returns.

6. The Detention Construction Budget: £83,333 per New Place

If Reform's £2bn construction allocation is intended to create the full 24,000 places, the implied capital allowance is approximately £83,333 per bed.

There is no clean official per-bed comparator for the government's current Campsfield and Haslar expansion because the Home Office has withheld whole-life cost information on commercial-sensitivity grounds. That itself is instructive: secure detention infrastructure is not a simple modular-housing procurement.

The existing Immigration Removal Centre Expansion Programme is delivering only 1,000 additional beds across Campsfield and Haslar, with construction, procurement, mobilisation, operator services and healthcare all requiring separate workstreams. The Home Office's Accounting Officer assessment explicitly applies risk and optimism bias to the programme.

Campsfield opened Phase 1 in December 2025 with 160 beds and is planned to expand to 400; Haslar is planned to reach 600. Reform's proposed 24,000-place estate is therefore approximately twenty-four times the entire additional capacity of that major government expansion programme.

The issue is not that 24,000 secure beds cannot physically be built. It is whether £2bn captures land/site remediation, planning, utilities, secure perimeter works, accommodation blocks, kitchens, healthcare, fire safety, IT, mobilisation and contingency at that speed.

7. Detention Operations: The £45-a-Night Problem

Reform's reported £2bn five-year detention-operating allocation can also be converted into an implied unit cost.

If 24,000 places were fully occupied for five years, £2bn would provide approximately £16,667 per bed-year, or about £45.66 per occupied bed-night.

That is not a forecast of actual occupancy: a high-throughput estate may run below 100% occupancy, while the 24,000 maximum may not exist from day one. But the arithmetic shows how sensitive the costing is to utilisation and ramp-up.

Current procurement gives some indication of the services involved. The planned Haslar operator contract covers site management, security and guarding, welfare and care, local escorting and hospital bed watches. Its published estimated value for the initial phase was £110m over a six-year contract period, while expansion to the full 600-bed capacity was outside that initial value.

Healthcare is also a separate requirement in current detention expansion. Reform's costing needs to show whether healthcare, local escorting, maintenance, utilities and contractor margins sit inside the £2bn detention line, the £1.5bn staffing line, or elsewhere.

THE DENOMINATOR MATTERS

A detention budget cannot be assessed without the occupancy curve. £2bn divided by 24,000 beds for five full years implies about £46 per bed-night. But if the estate ramps from 2,000 to 24,000 places over several years, or average occupancy is materially lower, the implied operating allowance per occupied night rises. Reform has not published the ramp-up profile needed to know which denominator it is using.

8. Capacity Is Not Automatically the Bottleneck

Twenty-four thousand detention places sound small beside a 600,000 removal target, but throughput changes the picture.

At an average 30-day detention period, 24,000 continuously available places could theoretically process about 288,000 detention episodes per year before allowing for vacancies and operational constraints. At 60 days, theoretical throughput falls to about 144,000; at 90 days, about 96,000.

Reform's average target is 120,000 removals per year. In pure bed arithmetic, 24,000 places could therefore be compatible with that target if average detention were comfortably below roughly 73 days and if nearly every detention culminated efficiently in removal.

Real systems do not operate at theoretical maximum throughput. People are released on bail, flights fail, documentation is delayed and detention can only lawfully be used where removal remains realistically achievable within a reasonable timeframe under the current framework. Reform proposes legal changes, but foreign documentation and destination cooperation remain operational constraints.

The important conclusion is that 24,000 beds do not by themselves prove the programme impossible — but neither do 24,000 beds prove 600,000 removals possible.

9. The £2bn Diplomatic-Incentive Budget

Reform has reportedly allocated £2bn to secure return agreements and third-country cooperation.

This is one of the least predictable lines in the model because there is no market price for sovereign cooperation. Countries can demand development funding, per-person payments, infrastructure support, visa concessions or refuse altogether.

The Rwanda partnership provides a caution against assuming that a diplomatic deal scales cheaply. The National Audit Office documented £370m of fixed Economic Transformation and Integration Fund payments, a further £120m once 300 people were relocated, £20,000 per relocated person and up to £150,874 per person in processing and integration payments over five years.

Rwanda was a third-country relocation model rather than a standard national readmission agreement, so its costs should not simply be multiplied across Reform's programme. Its relevance is narrower: negotiations can create large fixed and variable liabilities that are invisible in a simple "£2bn for deals" line.

If Reform intends to pay countries such as Afghanistan to receive their own nationals, the model should specify the assumed payment structure and how many of the 600,000 removals depend on such agreements.

10. The Savings Side: Who Is Actually Costing the Exchequer?

The most serious problem with many public arguments about deportation cost is that they treat every person targeted for removal as though they currently occupy a taxpayer-funded asylum hotel.

Home Office statistics show that at 31 March 2026, 97,519 people were receiving asylum support. Of these, 20,885 were in hotels, 72,768 were in other accommodation and 3,866 received subsistence-only support.

Reform's removal ambition of up to 600,000 people is therefore more than six times the entire supported asylum population at that date. The additional target population would necessarily include people outside asylum support — for example overstayers, people living with family or friends, people working illegally, people whose status is disputed, and potentially people whose previous asylum status Reform proposes to revisit.

Removing such a person may have fiscal effects, but those effects cannot automatically be valued at the asylum-hotel rate.

The Home Office currently estimates average accommodation cost at £144 per person per night in hotels and £23.25 in dispersal accommodation. Using the March 2026 supported population merely as a rough snapshot gives accommodation expenditure on the order of £1.7bn a year for those two groups before subsistence-only support and other costs. That is substantial — but it is far below £7bn and it is attached to fewer than 100,000 supported people, not 600,000.

THE SAVINGS-DENOMINATOR ERROR

You cannot calculate the saving from removing 600,000 people by multiplying 600,000 by the cost of an asylum hotel. Most of the 600,000 are not currently in asylum hotels. A valid model must assign each cohort its actual counterfactual public cost.

11. Hotels Are Expensive — and Already Falling

Hotel accommodation is genuinely expensive and reducing it produces real savings.

The Home Office estimated in June 2026 that hotel accommodation averaged £144 per person per night, compared with £23.25 in dispersal accommodation. The National Audit Office had previously found that hotels accounted for 76% of the cost of asylum-accommodation contracts during the first seven months of 2024/25.

But the baseline is moving. Hotel use fell from its September 2023 peak of about 56,000 supported people to 20,885 by March 2026. The government also states that accommodation costs have already fallen by nearly £1bn since it took office.

That matters for Reform's ten-year savings claim. A model based on permanently avoiding the peak hotel bill will overstate savings if the status quo itself is already moving people into cheaper accommodation or closing hotels.

The correct counterfactual is not "Reform versus the worst historical year". It is "Reform versus the expenditure trajectory reasonably expected without Reform's policy".

12. A £42bn Net Saving Requires More Than £42bn of Avoided Hotels

A net saving is the difference between avoided expenditure and the new programme's costs.

If Reform spends its stated £10bn over five years and still claims a £7bn net saving in that period, the model requires at least £17bn of gross avoided public expenditure over those five years, before considering timing or discounting.

If the programme produces a £42bn net saving over ten years, gross avoided expenditure must exceed £52bn over that decade if the £10bn implementation figure captures all relevant programme costs and no material post-year-five costs continue.

That equates to more than £5.2bn a year of average gross avoided expenditure over ten years. Such a figure is not impossible in principle if the counterfactual population would otherwise generate long-term accommodation, support and other public-service costs. But it requires a transparent cohort model.

The current supported-asylum population and accommodation unit costs do not by themselves reproduce £52bn of avoided spending. Reform therefore appears to rely on additional categories or long-duration assumptions that are not sufficiently specified on the published policy page.

13. The £7bn "Status Quo" Cost Needs a Boundary

Reform-linked material states that the current system costs more than £7bn per year, excluding additional burdens such as the NHS.

The difficulty is definitional. Does that £7bn mean asylum support and accommodation only? Immigration Enforcement? Border Force? legal aid? local-authority support? healthcare? education? policing? the entire Home Office asylum function? Or a fiscal estimate for a wider population of people without status?

Without a boundary, the number cannot be compared with the £10bn implementation budget because the two figures may not measure the same system.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

A valid savings model therefore distinguishes costs eliminated by the policy from costs merely reorganised or retained.

14. The Voluntary-Return Escape Valve

Voluntary return is the strongest route by which Reform could materially lower the average cost of its programme.

Farage's launch proposal reportedly included a six-month voluntary-return offer of £2,500 plus the cost of a flight. The current Home Office average for a voluntary return is £4,300, compared with £48,800 for an enforced return.

If large numbers accepted voluntary return before arrest and detention, Reform could avoid much of the most expensive enforcement machinery for those cases.

But this creates a modelling obligation. The party needs to state how many of its 600,000 target it expects to leave voluntarily. At current official unit costs, moving the assumed enforced share from 100% to 50% changes the illustrative cost by more than £13bn.

No other single assumption in the model is likely to matter more.

15. Scale Could Reduce Costs — or Increase Them

There is a reasonable argument that existing Home Office unit costs contain inefficiencies associated with low throughput, fragmented casework and partially filled charters. A government deliberately redesigning the system could achieve lower costs.

There is an equally reasonable countervailing argument. The easiest-to-remove people are likely to be removed first. As the programme progresses, the remaining population may contain a higher proportion of people without documents, people from states refusing cooperation, complex medical cases, family cases and cases requiring expensive identity work.

Large-scale procurement also creates mobilisation costs: recruiting and vetting staff, securing aircraft, training escorts, building secure accommodation, procuring healthcare, creating IT systems and managing new diplomatic agreements.

The responsible approach is therefore scenario analysis rather than assuming either constant current costs or automatic economies of scale.

16. A Reproducible Costing Model

Variable	Required calculation	Current evidence
Target population	Number actually eligible and practically removable	Reform headline: up to 600,000; cohort definition required
Voluntary-return rate	Share leaving without enforced detention/removal	Critical unknown
Enforced-return unit cost	Casework + detention + escort + flight	Home Office benchmark: £48,800
Voluntary-return unit cost	Casework + ticket + assistance	Home Office benchmark: £4,300
Detention capital	Cost and timing of 24,000-place estate	Reform reported: £2bn
Detention operating cost	Occupied bed-nights × unit cost	Reform reported: £2bn over five years
Flight cost	Routes × flights × load factor × escorts	Reform reported: £1.5bn
Staffing	Recruitment, salaries, training, pensions, overtime	Reform reported: £1.5bn

Variable	Required calculation	Current evidence
Diplomatic agreements	Fixed + per-person foreign payments	Reform reported: £2bn
Legal/court cost	Challenges, tribunal/court capacity, government legal work	Not transparently isolated
Avoided accommodation	People removed × actual support type × duration	Hotels/dispersal must be modelled separately
Avoided other support	Subsistence/local grants/other directly attributable costs	Boundary required
Counterfactual trend	What spending would fall anyway without policy	Hotels already declining
Discounting/inflation	Present-value treatment over ten years	Not published clearly enough to reproduce

17. Stress Test: What Would Have to Be True?

For Reform's £10bn gross five-year implementation cost to be credible alongside a 600,000-removal ambition, several favourable assumptions would probably need to hold simultaneously.

The voluntary-return share would need to be substantial; enforced-return unit costs would need to fall materially below the current Home Office average; detention stays would need to be short; aircraft would need consistently high utilisation; large numbers of destination states would need to cooperate without payments exceeding the £2bn diplomacy budget; and the 24,000-place estate would need to be delivered close to the £2bn capital allocation.

For the £42bn ten-year net saving to follow, the removed cohorts would additionally need to have generated more than £52bn of counterfactual public expenditure over the decade, assuming £10bn captures the relevant programme cost.

None of those propositions is logically impossible. The evidential problem is that the published material does not yet show them together in a model that an independent analyst can reproduce.

THE KEY VERDICT

The £42bn figure should currently be described as a party estimate, not an established saving. Reform has published the destination — £42bn net — and some headline inputs, but not enough of the bridge between them. The strongest challenge is therefore not "prove it is impossible"; it is "publish the spreadsheet".

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying that Reform's plan definitely costs £29.3bn; that every one of 600,000 removals would be enforced; that every deportee currently costs £144 a night in a hotel; that £2bn can definitely not build 24,000 secure places; that the Rwanda per-person cost can simply be applied to ordinary national returns; or that the £42bn saving has been disproved merely because current unit costs are higher than Reform's implied average. What the evidence supports is narrower and stronger: Reform has not yet published enough assumptions for the £42bn claim to be independently audited.

Policy Feasibility: From Political Promise To Practical Delivery

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

EVIDENCE SUMMARY

Purpose: Test the operational machinery behind Reform UK's ambition to remove up to 600,000 people over five years. This chapter asks what must happen every day — not merely what legislation must say.

Finding: The headline arithmetic is 120,000 removals a year, 10,000 a month and about 329 a day. Current annual returns are 39,007, of which 9,723 are enforced. Reform therefore requires roughly three times current total returns and more than twelve times current enforced returns if its target were predominantly coercive. Detention-bed arithmetic is not necessarily the binding constraint: 24,000 places could theoretically support 120,000 annual removals if turnover were sufficiently fast. The harder constraints sit upstream and downstream — locating people, resolving casework, proving identity, obtaining travel documents, securing destination-country acceptance, arranging escorts and keeping flights populated despite cancellations.

Central finding: The aircraft are not the machine. The removal pipeline is the machine. Five aircraft can leave every day only if hundreds of independently prepared cases arrive at the runway at exactly the right time.

Executive Brief

Reform's five-year target averages 120,000 completed removals a year: approximately 10,000 a month, 2,308 a week and 329 every day.

The UK recorded 39,007 returns in the year ending March 2026. Three-quarters were voluntary and only 9,723 were enforced. The required uplift is therefore about 3.1 times current total returns, but 12.3 times current enforced returns if Reform's programme is interpreted principally as mass enforcement.

The current detention system processed 22,586 entries during the same year. Reform proposes capacity for 24,000 people simultaneously — more than twelve times the 1,955 people actually held under immigration powers on 31 March 2026.

That enormous estate changes the constraint. If 24,000 places operated efficiently, bed capacity alone could support 120,000 removals a year at an average detention cycle of about 73 days. Current statistics show 71% of people actually returned from detention had spent less than one month detained. Pure bed arithmetic therefore does not prove the target impossible.

The Home Office's July 2026 country guide makes the foreign-state bottleneck concrete. Afghanistan currently accepts neither enforced nor voluntary returns; Eritrea is recorded as accepting voluntary departures only; Egyptian re-documentation is estimated at 90–365 days; Guinea at 365 days or more; Pakistan can take around 21 days for non-biometric ETD cases and has no timescale where supporting evidence is absent.

These are not British statutory barriers that Parliament can repeal. They are practical consequences of identity, consular processes, routing and the sovereign decisions of destination states.

The likely binding constraint is therefore not a single number. Reform would have to scale several interdependent systems at once, and the throughput of the entire chain is governed by its slowest stage.

1. Translate the Promise Into a Daily Production Target

Period	Completed removals required
Five years	600,000
Per year	120,000
Per month (average)	10,000
Per week (average)	2,308
Per day (365-day operation)	329
Per working day (260-day casework year)	462

The daily number is the most revealing. A target of 329 completed removals every calendar day means the system must prepare more than 329 cases a day because some scheduled removals will fail or be cancelled.

The production target nevertheless remains unchanged: the country must record 600,000 completed departures attributable to the programme.

2. The Starting Point Is Not Zero — But the Gap Is Large

Measure	YE March 2026	Reform annual average target	Scale change
All returns	39,007	120,000	3.08×
Enforced returns	9,723	120,000 if all enforced	12.34×
Voluntary returns	29,284	Depends on programme mix	Current system already relies heavily on voluntary departure

Measure	YE March 2026	Reform annual average target	Scale change
Entries into detention	22,586	Potentially far higher	At least 5.31× if every target removal required a detention entry

Current returns are already rising. Enforced returns increased 13% in the year ending March 2026, and the Home Office attributes part of the increase to international returns agreements and the reallocation of 1,000 staff into Immigration Enforcement.

That matters because it demonstrates two things simultaneously. First, administrative capacity can be increased. Second, an additional 1,000 staff contributed to an increase measured in thousands, not an immediate jump to six figures.

It would therefore be unreasonable to assume today's throughput is a permanent ceiling. It would be equally unreasonable to assume a twelve-fold increase in enforced removals follows automatically from a larger budget.

3. The Removal Pipeline

Stage	Required output	Dependency
1. Identify	Locate a person potentially liable to removal	Intelligence, enforcement visits, reporting, police/prison referrals
2. Establish status	Confirm identity, nationality and legal position	Case records, biometrics, immigration history
3. Resolve barriers	Complete claims, submissions and relevant legal processes	Caseworkers, legal teams, tribunals/courts where engaged
4. Secure documentation	Passport, UK letter, ETD or destination agreement	Home Office + embassy/foreign authority
5. Detain / manage	Place person into appropriate pre-removal pathway	IRC bed, bail/community management, transport
6. Fitness & risk	Medical fitness, risk assessment, family/special arrangements	Healthcare, caseworker, escort planning

Stage	Required output	Dependency
7. Book movement	Route, airline/charter, transit permissions	Travel provider, Charters team, carriers
8. Escort	Move to airport and accompany where required	Contracted escorts / DEPMU coordination
9. Acceptance	Destination admits the individual	Foreign government / border authority
10. Complete return	Departure occurs and case is closed	Home Office records and post-removal clearance

THE PIPELINE RULE

Capacity added at one stage does not automatically increase completed removals. Building 24,000 detention places achieves little if the documentation queue can only produce 100 removable people a day. Buying five aircraft achieves little if casework produces only two viable manifests. Throughput is set by the slowest indispensable stage.

4. Detention: Surprisingly, Not Necessarily the First Constraint

The proposed 24,000-place estate initially looks small against 600,000 removals. Turnover arithmetic says otherwise.

To produce 120,000 removals a year from 24,000 continuously available places, each place needs to support five completed removals per year. That corresponds to an average cycle of roughly 73 days.

Current detention durations are often shorter. In the year ending March 2026, 67% of all people leaving immigration detention had spent less than a month there. Among those actually returned from detention, 71% had been detained for less than one month and 37% for less than a week.

If Reform could populate the estate almost entirely with already-documentable, legally removal-ready cases, 24,000 beds would be more than enough in mathematical terms. At a 30-day average cycle, theoretical throughput is about 292,000 bed-cycles per year.

Average occupied detention cycle	Theoretical annual cycles from 24,000 places	Against 120,000 target
14 days	~625,700	5.2× target
30 days	292,000	2.4× target
60 days	146,000	1.22× target

Average occupied detention cycle	Theoretical annual cycles from 24,000 places	Against 120,000 target
73 days	120,000	Approximately target
90 days	97,333	Below target
180 days	48,667	Far below target

5. The Detention Estate Would Be a Different System, Not an Expansion

On 31 March 2026, 1,955 people were held under immigration powers in detention facilities or prisons. Reform's 24,000-place proposal is therefore more than twelve times the detained population on that snapshot date.

The government's current Haslar and Campsfield programme is adding 1,000 beds and describes that as contributing to a 40% increase in detention capacity. Reform is proposing twenty-four times that additional bed programme.

Physical construction is only one component. A twelve-fold operating scale requires healthcare, custody officers, welfare staff, catering, maintenance, transport, interpreters, legal-access arrangements, security, management and incident response at comparable institutional scale.

The estate must also be geographically connected to courts, airports, hospitals and escort networks. Twenty-four thousand beds in the wrong places are not equivalent to 24,000 operational removal places.

6. Documentation: The Constraint Parliament Cannot Command Away

The July 2026 Country Returns Guide demonstrates enormous variation. Some states accept UK letters or expired identity documents. Others require interviews, fingerprints or emergency travel documents. Some provide no consistent timescale.

Examples matter because a 120,000-per-year programme cannot be modelled using one average "paperwork time". The nationality mix determines the queue.

Country / route	Current Home Office position	Illustrative documentation constraint
Afghanistan	All enforced and voluntary returns paused	No Afghan diplomatic mission accredited to the UK able to issue travel documents
Eritrea	Enforced returns not accepted; voluntary departure only	ETD process up to 90 days

Country / route	Current Home Office position	Illustrative documentation constraint
Egypt	Enforced return accepted	Re-documentation approximately 90–365 days
Guinea	Enforced return accepted	Re-documentation 365 days or more
Morocco	Enforced return accepted	Up to 56 days
Pakistan	Enforced return accepted	Biometric cases ~8 working days; non-biometric ETD ~21 days; no timescale without supporting evidence
France	Enforced return accepted where applicable	ETD cases require video interview and consular attendance; compliant cases up to 30 days
Nigeria	Enforced return accepted	Processes vary with supporting evidence; advance notice / interview can be required

SOVEREIGNTY MEETS DOCUMENTATION

A British Act of Parliament can change the UK test for removal. It cannot make an Egyptian authority issue an emergency document in five days rather than 90–365, make Eritrea accept an enforced return it currently does not accept, or create an Afghan consular document process that currently does not exist.

7. A Manifest Is Hundreds of Individual Legal and Operational Files

The phrase “five deportation flights a day” makes the programme sound principally like an aviation operation. Home Office guidance shows otherwise.

The guidance explicitly warns that failure to provide the required immigration factual summary can result in a case being removed from the flight manifest.

At an average 66 removals per charter and five charters a day, the system would need approximately 330 complete, synchronised case files reaching manifest-ready status every day — plus replacements for cases that drop out.

8. Failure and Cancellation Have to Be Modelled

No serious throughput model can assume that every booked removal becomes a completed removal.

Home Office guidance contains dedicated procedures for deferral, cancellation and failed removals. Barriers can arise from judicial review, court injunctions, representations, casework developments, documentation, health, airline acceptance and disruption.

This creates a crucial distinction between scheduled capacity and completed throughput. If a programme requires 329 completed removals a day and 10% of final-stage cases fail, it needs about 366 final-stage attempts a day. At 20% failure, about 411; at 30%, about 470.

Final-stage non-completion rate	Attempts needed for 329 completed removals/day	Annual attempts
0%	329	~120,085
10%	366	~133,590
20%	411	~150,015
30%	470	~171,550

9. Escorts Are a Finite Resource

It also contains an unusually revealing operational warning: escort availability is restricted around charter or group-flight dates.

10. The Aircraft Are Probably the Easiest Part

Aviation capacity is visible, which makes it politically attractive, but it is unlikely to be the fundamental bottleneck.

A Home Office charter to Nigeria and Ghana in April 2025 returned 43 people. A 2024 charter to Vietnam and Timor-Leste returned 46. Those flights illustrate how small current manifests can be compared with aircraft capacity.

Five daily flights averaging 66 returnees would require 1,825 charter departures a year. Airlines and charter brokers can in principle procure aircraft, but the programme must also obtain slots, crews, destination permissions, transit arrangements where necessary and sufficient escort capacity.

11. Voluntary Return Changes the Entire Throughput Problem

Current returns statistics contain a fact that is easy to overlook: 29,284 of 39,007 returns in the year ending March 2026 were voluntary. The existing system therefore achieves most departures without an enforced-removal operation.

If Reform’s six-month financial incentive generated a similarly large voluntary component, the burden on detention, escorts and charters would fall dramatically.

For illustration, a 75% voluntary / 25% enforced split across 120,000 annual returns would mean 90,000 voluntary departures and 30,000 enforced returns. Enforced throughput would still need to triple from today's 9,723, but it would no longer need to rise twelve-fold.

Conversely, if the target population is resistant to departure and the voluntary share collapses, the detention and enforcement machine becomes vastly more demanding.

The voluntary-return assumption is therefore simultaneously a fiscal variable, as shown in Section 5.2, and an operational variable. Reform cannot credibly model one without the other.

Annual target mix	Voluntary	Enforced	Enforced uplift vs 9,723 current
75% voluntary / 25% enforced	90,000	30,000	3.09×
50% / 50%	60,000	60,000	6.17×
25% voluntary / 75% enforced	30,000	90,000	9.26×
100% enforced	0	120,000	12.34×

12. Staff: A Headcount Is Not a Throughput Model

The current government reallocated 1,000 staff to Immigration Enforcement in 2024 and is now planning a 60% workforce increase from the 2024 baseline by 2026/27, alongside a doubled enforcement budget by 2028/29.

That provides a useful real-world comparison: scaling returns already requires recruitment and redeployment across a specialist organisation.

Reform's reported £1.5bn staffing allocation needs to be translated into roles, not merely headcount. The programme requires arrest teams, caseworkers, travel-document specialists, charter planners, detention managers, contract managers, intelligence staff, legal liaison, escorts and administrative support.

These roles are not perfectly interchangeable. Recruiting 5,000 additional officers does not solve a shortage of experienced caseworkers or country-documentation specialists if those are the binding constraint.

A publication-grade plan would therefore show workforce by function, training time, productivity assumption and expected attrition.

13. Destination Mix Determines Throughput

The 600,000 target is often discussed as one homogeneous population. Operationally it is hundreds of nationality and status cohorts.

Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.

The target can therefore only be assessed properly if Reform publishes the estimated nationality composition of the 600,000 and the assumed return route for each major cohort.

Without that distribution, a statement such as “five flights a day” tells us almost nothing about whether five viable destinations exist on a given day for five full manifests.

14. The Afghanistan Test

Afghanistan is a particularly useful stress test because Reform figures have publicly discussed return agreements with Afghanistan as part of the wider policy debate.

The Home Office country guide updated 6 July 2026 states that all enforced and voluntary returns to Afghanistan are currently paused and that there is no Afghan diplomatic mission accredited to the UK able to issue travel documents.

That does not mean a future British government could never negotiate a different arrangement. It means that the throughput is currently zero under the existing documentation route.

Any costing or timetable that assumes Afghan removals must therefore include the diplomatic agreement as a prerequisite rather than treating the person as immediately removable once UK law changes.

15. The Binding-Constraint Test

System component	Core question	UK control	Assessment
Legislative authority	Can Parliament create wider removal powers?	High domestic controllability	Not likely to be the long-run physical bottleneck after legislation
Detection / arrest	Can sufficient people be located and brought into process?	Medium-high	Major scaling requirement
Casework	Can status/barriers be resolved fast enough?	High domestically, but legally constrained	Potential bottleneck
Detention beds	Are sufficient secure places available?	High if built	24,000 could be adequate at fast turnover

System component	Core question	UK control	Assessment
Travel documents	Can nationality/identity be documented?	Shared with foreign states	Strong candidate for binding constraint
Destination acceptance	Will another state admit the person?	Low UK unilateral control	Strongest structural constraint
Escorts	Can secure movements be staffed?	High but specialist workforce	Potential bottleneck at five charters/day
Aircraft	Can seats/charters be procured?	High with money and notice	Probably not primary constraint
Courts/legal challenges	Can cases withstand challenge and deadlines?	Partly controllable by legislation/resources	Can create final-stage failures
Voluntary participation	How many leave without coercive process?	Influenceable, not controllable	Variable that changes every other requirement

PRELIMINARY BOTTLENECK VERDICT

If Reform successfully legislated its domestic programme and built the full 24,000-place estate, the most difficult constraint would probably migrate away from detention capacity toward documentation and destination acceptance. Those are precisely the stages where British spending and legislation have the least unilateral control.

16. What a Credible Five-Year Ramp Would Need to Show

A serious implementation plan would not assume 120,000 removals from day one. It would publish a ramp.

Year 1 would need to recruit and train staff, procure or construct detention capacity, negotiate return agreements, build documentation pipelines and expand escort/charter contracts while removals continue through the existing system.

Later years would then need to exceed the 120,000 annual average if early years fall below it. For example, if only 50,000 removals were achieved in Year 1 and 90,000 in Year 2, the remaining three years would need 153,333 each.

That catch-up effect is important because infrastructure programmes commonly ramp gradually. Every year of delayed capacity increases the required mature-state throughput.

Illustrative year	Completed removals	Cumulative	Remaining target
Year 1	50,000	50,000	550,000
Year 2	90,000	140,000	460,000
Year 3	150,000	290,000	310,000
Year 4	155,000	445,000	155,000
Year 5	155,000	600,000	0

17. The Difference Between “Removable” and “Removed”

This distinction is the core of the chapter.

Conversely, some people can be returned rapidly because they possess valid documents, cooperate and travel to a country with a mature returns relationship.

The 600,000 headline is therefore not itself a throughput denominator. Reform would need to classify how many of those 600,000 sit in each operational category.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying 600,000 removals are physically impossible; that 24,000 detention places are automatically insufficient; that five flights a day could never be chartered; that every removal requires detention; or that current Home Office throughput is the maximum any future government could achieve. Nor does it support the opposite simplifications: that building detention centres creates removable people, that passing a law creates travel documents, that a booked flight equals a completed return, or that another sovereign state can simply be ordered to accept whoever Britain sends.

Policy Feasibility: From Political Promise To Practical Delivery

Evidence-based public interest review • 13 August 2026

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

EVIDENCE SUMMARY

Purpose: Test the foreign-policy dependency hidden inside Reform UK's migration and Channel policies. The question is not whether a British government can change British law; it is what happens when implementation requires another sovereign state to issue documents, accept a person, permit entry into territorial waters, provide policing, or conclude a readmission agreement.

Finding: The strongest successful UK return systems are cooperative systems. The UK–Albania arrangements accelerated returns through joint operational work. The current UK–France pilot has returned 1,087 small-boat arrivals to France by 30 June 2026 — but only because France agreed a reciprocal treaty mechanism. By contrast, Home Office guidance records Afghanistan as accepting neither enforced nor voluntary returns at present, and Eritrea as not accepting enforced returns. Those constraints cannot be abolished by an Act of the UK Parliament.

Operation Fortress sharpens the contradiction. Reform proposes Royal Navy interception and return to France or Belgium, yet Britain cannot unilaterally create a French or Belgian obligation to receive those people, nor can British forces simply treat another state's territorial waters and coastline as a domestic deportation zone. The more unilateral the rhetoric becomes, the more successful delivery depends upon international consent.

Executive Brief

Reform's migration programme contains two different kinds of state power. Domestic powers — detention rules, Home Office organisation, statutory appeal rights and deployment of British assets — can be altered substantially by a government with a parliamentary majority. External powers cannot.

A completed removal requires somewhere lawful and practically available for the person to go. For many national returns that means nationality verification and travel documents from the country of origin. For a third-country return it means an agreement with a state willing to accept a person who may not be its national. For a Channel return to France, it means a French legal and operational mechanism for readmission.

The existing UK–France Agreement demonstrates the point unusually clearly. It entered into force on 6 August 2025 and operates reciprocally: eligible small-boat arrivals can be returned to France while an equivalent number of eligible people are transferred from France to the UK. By 30 June 2026, 1,087 people had been returned to France and 1,117 transferred into Britain.

Those 1,087 returns are not evidence that Britain can simply take anybody back to France. They are evidence that returns to France become possible when France agrees the rules, scope, documentation and reciprocal obligations.

Brexit removed the UK from the Dublin III system from January 2021. The House of Commons Library noted that the UK consequently lost the ability to use Dublin III to return asylum seekers to participating European states. Current Home Office guidance is explicit that safe-third-country return is subject to the third country's agreement.

Reform's Operation Fortress therefore cannot solve the consent problem merely by replacing Border Force cutters with warships. Reuters reported Reform's proposal to intercept small boats and return people to France, while experts noted that British forces cannot operate in French territorial waters without permission.

The policy can create a deterrent only if France or another state accepts the people intercepted. If France refuses, the Royal Navy still has people aboard British state vessels and a destination problem rather than a completed return.

The same principle applies far beyond France. Albania demonstrates what cooperation can achieve; Afghanistan demonstrates what happens when the necessary diplomatic/documentation channel does not exist.

1. Sovereignty Has Two Sides

Political discussion often treats sovereignty as though it were a power possessed only by Britain. In international migration policy, every relevant state possesses it.

Britain can decide who has permission to enter or remain in Britain. France decides who may enter France. Albania decides whether a person is recognised and admitted as Albanian. Afghanistan's de facto authorities and documentary institutions determine whether the practical machinery exists to recognise and receive Afghan nationals. Airlines and transit states operate within their own legal frameworks.

That creates a simple implementation rule: the UK can make a person removable under UK law without making that person receivable somewhere else.

This distinction is central to any mass-removal policy because a removal order is an instruction to the British state; it is not an instruction to a foreign government.

THE SOVEREIGNTY PARADOX

"Take back control" can increase Britain's freedom to change domestic rules while simultaneously making successful enforcement more dependent on bilateral negotiation. The harder Britain insists on its sovereign right to decide who enters Britain, the harder it is to deny France, Albania, Afghanistan or any other state the same sovereign right.

2. Brexit Provides a Real-World Experiment

Before the end of the Brexit transition period, the Dublin III Regulation provided a multilateral framework for determining which participating European state was responsible for certain asylum claims and for transferring people between those states.

The UK ceased participating from January 2021. The House of Commons Library stated plainly that the UK would no longer be able to use Dublin III to return asylum seekers who had travelled from EU member states.

The post-Brexit inadmissibility rules allow the Home Office to treat some claims as inadmissible where a person has a connection with a safe third country. But the Home Office's current statistics guidance adds the crucial qualification: return to that safe third country is "subject to that country's agreement".

In other words, domestic inadmissibility and international readmission are separate stages. Parliament can legislate the first. It cannot unilaterally manufacture the second.

Framework	What Britain can decide	What Britain cannot decide alone
UK immigration law	Who is liable to removal; domestic procedure; detention powers	Whether another country will admit the person
Safe-third-country inadmissibility	Whether the UK considers a claim inadmissible	Whether the safe third country agrees to receive the claimant
Nationality return	Whether UK law permits removal	Whether nationality is verified / documents issued where required
Third-country relocation	Selection and UK-side transfer powers	Whether a non-national is accepted and on what financial/legal terms
Channel interception	Deployment of UK vessels in waters where UK has authority	Entry into French territorial waters; French disembarkation/readmission without consent

3. France: The Country Reform Needs Most

France is not merely the geographical origin point of most Channel launches. It is the indispensable sovereign partner in any policy whose endpoint is "return them to France".

The UK and France already cooperate extensively: policing, intelligence, beach interventions, border infrastructure and the current reciprocal readmission pilot all depend on bilateral arrangements.

That history matters because it rebuts two opposite simplifications. It is wrong to say France does nothing; French authorities have repeatedly prevented launches and, in 2026, physically intercepted

boats at sea on multiple occasions. It is equally wrong to imply that cooperation gives Britain a general right to return anybody to France.

The current pilot is deliberately rule-bound. A person must fall within the agreement's scope, and the scheme operates reciprocally rather than as a unilateral British transfer power.

4. The Existing UK–France Deal Proves Both Possibility and Dependency

The Agreement on the Prevention of Dangerous Journeys entered into force on 6 August 2025.

Under the pilot, eligible people arriving in the UK by small boat can be returned to France. In exchange, an equivalent number of eligible people are transferred from France to Britain following eligibility, identity, documentation and security checks.

By 30 June 2026, the Home Office recorded 1,087 people returned to France and 1,117 transferred into the UK.

The scheme therefore demonstrates that direct return to France is not inherently impossible. But its architecture also demonstrates what makes it possible: a treaty, agreed eligibility rules, documentation, operational cooperation and French consent.

Scaling from roughly one thousand agreed returns to a policy intended to intercept essentially every Channel boat would require either a radically expanded agreement or an entirely new one. Britain cannot create that French obligation by changing British legislation.

WHAT 1,087 RETURNS ACTUALLY PROVE

They do not prove "France has to take them back because they came from France". They prove almost the opposite: the UK and France had to negotiate a specific readmission mechanism before those returns could take place.

5. Operation Fortress: The Destination Problem

On 3 August 2026 Reform announced Operation Fortress, proposing a major military deployment in the Channel. Reuters reported that Reform would use the Royal Navy to intercept small boats and return people to France, with Farage saying the crossings could be stopped within two weeks.

The military element changes who intercepts the boat; it does not answer where the intercepted people are legally and practically disembarked.

British forces cannot simply enter French territorial waters to conduct a British immigration operation without French permission. Nor does interception in British or international waters create a unilateral British entitlement to land people on French territory.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

That is why the destination question is logically prior to the naval question.

6. “They Came From France” Is Not a Readmission Treaty

A common political argument says France cannot refuse a person because the person departed from a French beach.

That is not how current UK policy describes safe-third-country return. The Home Office states that return is subject to the receiving country’s agreement.

Physical provenance and legal readmission are different concepts. Evidence that somebody travelled through France can support a British inadmissibility decision; it does not itself compel France to readmit that person under British law.

The post-Brexit history reinforces this point. Once Dublin III ceased applying, the UK could no longer rely on that multilateral transfer mechanism and had to seek new arrangements. The 2025 UK–France agreement is one such arrangement.

7. Territorial Waters Matter

The Channel is not a borderless strip of water. France exercises sovereignty in its territorial sea and the UK exercises sovereignty in its own, subject to the applicable law of the sea.

Reform can order British naval assets to operate on the UK side within lawful authority. It cannot order France to permit British military vessels to enter French waters for the purpose of returning intercepted migrants.

Reuters’ reporting on Operation Fortress highlighted this precise practical problem: analysts questioned the plan because British vessels cannot operate in French territorial waters without permission.

Even where a vessel is intercepted outside French territorial waters, disembarkation on the French coast remains an act requiring a lawful French reception mechanism.

8. Rescue Does Not Automatically Mean “Return to France”

Operation Fortress has been framed partly as “rescue and return”. Rescue obligations and immigration readmission are not the same legal process.

The distinction is visible in actual Channel rescues. French authorities can rescue and return people to France because France is acting through its own competent authorities. A British rescue does not automatically transfer that French sovereign authority to the Royal Navy.

The policy therefore needs a pre-agreed disembarkation protocol, not merely an instruction to a ship’s captain.

9. France Could Also Withdraw Cooperation Elsewhere

The bilateral relationship is wider than readmission. British strategy has long depended on French beach patrols, surveillance, intelligence sharing and joint action against smuggling networks.

The Sandhurst Treaty and subsequent joint plans created operational structures including the Coordination and Information Centre in Calais. British funding has supported French prevention activity and equipment.

That creates a second-order risk for any deliberately unilateral policy. A confrontation over forced returns could affect cooperation that prevents boats launching in the first place.

This is not an argument that France would inevitably terminate cooperation; predicting retaliation would be speculative. It is an implementation risk that a serious plan must assess because the UK cannot simultaneously assume French non-cooperation for the naval policy and French cooperation for policing, intelligence and reception.

THE COOPERATION TRADE-OFF

A policy designed to demonstrate that Britain no longer needs French cooperation may depend on France continuing to police beaches, share intelligence, receive returnees and tolerate British operational activity. Those assumptions must be made explicit rather than treated as compatible by default.

10. Albania: The Counterexample Reform Should Study

Albania shows that large improvements in returns can occur when the destination state cooperates.

The UK and Albania agreed a joint communiqué in December 2022 covering migration cooperation, trafficking and returnees. Operational teams intensified work, including data and documentation cooperation.

By April 2023 the Home Office reported more than 1,000 Albanian nationals returned since the communiqué; by June 2023 the government reported more than 1,800 Albanian illegal migrants and foreign criminals returned on weekly flights since December.

The lesson is not that every country can be treated like Albania. It is that diplomacy, documentation and joint operations can materially change throughput.

For Reform, Albania is therefore evidence in favour of aggressive returns policy — but specifically evidence in favour of negotiated returns policy.

11. Afghanistan: The Opposite End of the Spectrum

Afghanistan illustrates the opposite operational condition.

The Home Office Country Returns Guide updated 6 July 2026 states that all enforced and voluntary returns are paused and that there is no Afghan diplomatic mission accredited to the UK able to issue travel documents.

That means a British government wishing to restart large-scale Afghan returns must first change the external relationship: establish a documentary mechanism, secure acceptance and resolve the practical route.

Reform has proposed allocating money to return agreements. That acknowledges the underlying reality: domestic removal power is not sufficient where the destination machinery is absent.

Payment may alter another state's incentives, but it cannot guarantee agreement and it creates its own diplomatic, ethical, sanctions and value-for-money questions.

12. Return Agreements Are Markets Without a Market Price

Section 5.2 identified Reform's reported £2bn allocation for diplomatic incentives and return deals. Section 5.4 explains why that line is so difficult to cost.

The UK–Rwanda experience demonstrated how a returns/relocation partnership can accumulate large fixed and variable commitments even before substantial transfers occur. Albania demonstrates that cooperation can also be embedded in a much wider bilateral relationship rather than reduced to a per-person fee.

A credible Reform model therefore needs a country-by-country diplomacy assumption, not simply a £2bn central pot.

13. Nationals and Non-Nationals Are Different Diplomatic Problems

Returning somebody to their own country and relocating somebody to a third country are fundamentally different propositions.

A country generally has a strong basis for receiving its own verified nationals, although documentation and cooperation can still delay the process. A third country is being asked to admit somebody who may have no nationality or residence connection to it.

That distinction explains why third-country schemes can require substantial financial or political inducements.

It also matters for France. Many small-boat arrivals are not French nationals. The claim “they came from France” is therefore a request for France to accept non-French nationals under a safe-third-country/readmission arrangement, not an ordinary national repatriation.

14. The Brexit Irony

There is a particular institutional irony in presenting bilateral negotiation as evidence that sovereignty makes returns simple.

EU membership did not mean Britain could automatically return every asylum seeker to France. Dublin III had rules, evidential tests and reciprocal transfers, and the UK was sometimes a net recipient under the system.

But it did provide an established multilateral mechanism. Brexit ended UK participation. The UK subsequently had to construct replacement arrangements from outside the EU framework.

The 2025 UK–France pilot is therefore not evidence that bilateral sovereignty eliminates dependency. It is evidence of the diplomatic work required to rebuild a limited transfer mechanism after the broader multilateral one ceased to apply.

IMPORTANT QUALIFICATION
The evidence does not establish that Brexit alone “caused the small-boats crisis”, nor that Dublin III would have allowed Britain to return everyone to France. The defensible finding is narrower: Brexit removed an existing legal transfer framework, and post-Brexit UK rules cannot themselves compel an EU state to accept a safe-third-country return.

15. Can Britain Use Leverage?

A powerful state is not powerless simply because another country must agree. Britain can negotiate.

Potential leverage can include development assistance, visas, trade relationships, policing cooperation, intelligence, security assistance, diplomatic recognition, prisoner-transfer arrangements and financial support for reintegration.

The Albania relationship shows the value of bundling migration cooperation into a broader bilateral partnership. Reform's proposed diplomatic fund recognises the same principle.

But leverage has opportunity costs. A concession used to secure readmission may affect another policy objective, and threatening a partner can reduce cooperation elsewhere. The relevant question is therefore not "does Britain have leverage?" but "what does the agreement cost, what else does Britain concede, and how durable is it?"

16. A Country-by-Country Deliverability Matrix

Destination / partner	Current cooperation position	UK unilateral control	Implication for Reform
France	Specific reciprocal pilot; extensive policing/intelligence cooperation	Low on French admission	Mass Channel return requires expanded/new French agreement
Albania	Mature bilateral returns cooperation; national returns at scale demonstrated	Medium once nationality verified	Strong example of negotiated throughput
India	Large current voluntary-return volumes; established return/reintegration pathways	Medium	Potentially scalable, but voluntary/enforced mix matters
Pakistan	Enforced returns accepted; documentation route varies by evidence	Medium-low on ETD timing	Documentation capacity must scale
Egypt	Enforced returns accepted; redocumentation can take 90–365 days	Low on consular speed	Long queue risk

Destination / partner	Current cooperation position	UK unilateral control	Implication for Reform
Guinea	Enforced returns accepted; redocumentation 365+ days in current guide	Low	Poor fit for rapid five-year throughput without changed process
Eritrea	No enforced returns accepted in current guide	Very low	Requires diplomatic change before coercive throughput exists
Afghanistan	All returns currently paused; no accredited mission issuing documents	Very low	Requires new diplomatic/documentary architecture before returns restart
Third-country partner	No automatic duty to accept non-national	Very low	Agreement and likely consideration required

17. The Two-Week Claim

Farage's claim that Operation Fortress could stop Channel crossings within two weeks should be separated into two propositions.

The first is whether Britain can deploy military assets quickly. A government can order rapid mobilisation of available British assets.

The second is whether those assets can lawfully and repeatedly complete returns to France or Belgium. That depends on an agreed destination mechanism, operational protocols and the response of those governments.

Unless Reform already possesses a commitment from France or Belgium that would survive a change of British government, the two-week timetable contains an external dependency that a British election result cannot resolve on its own.

That does not make a future agreement impossible. It makes the timetable contingent rather than unilateral.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying France is legally required to take back everyone who launched from its coast; that Britain can simply sail deportees into a French port; that leaving the ECHR would give the UK authority over French territory; that Brexit means no returns to France are possible; that Dublin III previously allowed Britain to return everyone to France; that France does nothing to prevent crossings; or that every foreign state will refuse Reform's return agreements. The evidence supports a more consequential proposition: every large-scale returns programme is partly a foreign-policy programme.

Policy Feasibility: From Political Promise To Practical Delivery

5.5 Operation Fortress at Sea: Interception, Rescue and the Law of the Channel

EVIDENCE SUMMARY

Purpose: Translate Reform UK's promise to "intercept", "rescue" and return small boats into the decisions a naval commander would actually face at sea.

Finding: The Royal Navy can provide surveillance, command-and-control, seamanship and rescue capacity. But those capabilities do not create a general power to force an overloaded inflatable back to France. The operational problem changes the moment a craft becomes unsafe or people are in distress: the priority becomes preservation of life. A rescue then creates a disembarkation problem, not an automatic entitlement to choose France as the destination.

Naval evidence matters here. Former and retired senior Royal Navy officers have repeatedly warned that additional naval assets may improve safety without deterring departures, that unsuitable warships are an inefficient tool for the task, and that return is the decisive missing element. The Navy itself declined to implement turnaround tactics under Defence primacy in 2022.

Executive Brief

Operation Fortress uses military language for what is ultimately a maritime interception-and-disembarkation system. Those are not the same thing.

International law imposes a duty to render assistance to persons in distress at sea. Article 98 of UNCLOS requires states to require shipmasters, where reasonably possible and without serious danger to their own vessel, crew or passengers, to assist people in danger of being lost at sea.

The IMO's revised 2026 Rescue at Sea guidance likewise emphasises rescue and safe disembarkation. Once a fragile, overcrowded inflatable is in distress, a naval commander's immediate problem is life-saving rather than immigration enforcement.

That makes "turn the boat around" operationally ambiguous. Does it mean ordering its occupants to reverse course? physically blocking it? escorting it? towing it? transferring everyone to a British vessel? or rescuing everyone and attempting to disembark them in France? Each action has different safety and legal consequences.

The UK has tested this territory before. In 2022 the Government acknowledged that there were only limited circumstances in which turnaround tactics could be used safely. The Ministry of Defence stated that the Royal Navy would not implement or assist in turnaround tactics under Defence primacy.

The Defence Committee's Operation Isotrope inquiry was highly critical of the earlier military deployment. It found concerns about objectives, resources, naval reputation and relations with France, concluding that the policy announcement was premature and the decision-making flawed.

Former naval officers provide unusually relevant expert evidence. Retired Commander Tom Sharpe told Parliament in 2022 that filling the Channel with ships could make crossings safer and therefore more attractive. Former First Sea Lord Admiral Sir George Zambellas similarly warned that extra sea and air assets increase surveillance and rescue opportunities but are unlikely by themselves to deter sailings.

Those warnings remain directly relevant to Operation Fortress. In August 2026 Sharpe criticised Reform's plan again, arguing that billion-pound warships configured for military threats are the wrong platform for ferrying people.

Former First Sea Lord Admiral Lord West made the complementary point in 2025: naval interception makes little difference unless the people intercepted can actually be returned. That connects the maritime problem in 5.5 directly to the foreign-state consent problem established in 5.4.

1. What Does "Intercept" Actually Mean?

Political phrase	Possible naval action	Immediate problem
Detect	Radar, aircraft, drones, visual surveillance	Detection alone does not alter course or destination
Intercept	Approach and establish control/contact	What lawful instruction follows?
Block	Position vessel to prevent forward movement	Collision/wash/capsize risk with fragile craft
Turn back	Order or induce craft to reverse course	Safety, seaworthiness, fuel and French reception

Political phrase	Possible naval action	Immediate problem
Escort back	Remain alongside while craft travels toward France	Requires craft to remain safe and France to receive it
Tow	Attach and tow craft	Safety and consent; destination still unresolved
Rescue	Recover occupants onto a safer vessel	Creates duty to bring rescued people toward safe disembarkation
Transfer	Move occupants to another craft or ship	Custody, capacity, medical and disembarkation issues

2. The Commander's Dilemma

A naval commander does not encounter an abstract policy. The commander encounters a particular boat in particular sea conditions with a particular number of people aboard.

If the craft is seaworthy, not in distress and capable of navigating safely, an interception policy still needs a lawful and safe mechanism for changing its course.

If the craft is overloaded, taking water, without adequate life-saving equipment, on fire, disabled or otherwise in distress, the decision changes. The law-of-the-sea framework prioritises rescue.

The paradox is obvious: the more dangerous the small boat is, the less plausible it becomes to use manoeuvres that deliberately prolong its voyage or force it to navigate back across busy shipping lanes.

THE SAFETY SWITCH

Operation Fortress cannot treat "interception" as one unchanging tactic. Once distress arises, the mission changes from border enforcement to rescue. A policy that deliberately defines every small-boat occupant as being in distress — as Reform has suggested — makes that switch happen immediately.

3. The Duty to Rescue Is Not Optional

UNCLOS Article 98 requires assistance to people at sea in danger of being lost and requires coastal states to maintain effective search-and-rescue services.

The International Maritime Organization's 2026 revised Rescue at Sea guide restates the practical objective: rescue people in distress and ensure safe disembarkation in accordance with international law.

The SAR framework also requires cooperation between states and coordination toward an appropriate place of safety.

These duties apply because of the condition of the people at sea, not because a naval commander approves of how they came to be there.

4. Rescue Does Not Answer the Destination Question

Recovering people onto a Royal Navy vessel solves the immediate danger. It does not determine where they can be put ashore.

IMO guidance describes a “place of safety” as the location where the rescue operation is considered to terminate. Search-and-rescue authorities are expected to coordinate arrangements for disembarkation.

That is why Reform’s phrase “rescue and return” contains two separate operations. Rescue can be performed by Britain. Return to France requires the French-side legal and operational mechanism examined in Section 5.4.

A naval commander cannot convert rescue law into a unilateral right to select another sovereign state’s port.

5. The Navy Has Been Asked Before

The closest modern precedent is Operation Isotrope, under which the Royal Navy assumed a coordinating role for Channel small-boat activity in 2022.

The Defence Committee investigated the decision before full implementation. It concluded that the Government had failed to provide sufficient clarity about the Navy’s role, assets, objectives and measures of success.

The Committee also warned about pressure on naval resources, potential damage to the Navy’s reputation and the effect on relations with the French navy.

The experiment is particularly relevant because the Government subsequently confirmed that turnaround tactics had been withdrawn. In November 2022 the Ministry of Defence stated that the Royal Navy would not implement or assist in their implementation under Defence primacy.

THE 2022 PRECEDENT

This is not a hypothetical objection invented for Reform. Britain previously transferred Channel responsibility to Defence, examined turnaround tactics and then operated without the Royal Navy implementing those tactics. Any new proposal should explain what has changed operationally since that experience.

6. What Former Naval Commanders Actually Say

The inclusion of naval testimony is important because these witnesses are not merely commenting on immigration politics. They have commanded ships, managed maritime operations or led the service that Reform proposes to deploy.

Retired Commander Tom Sharpe gave evidence to the Defence Committee during Operation Isotrope and has now commented directly on Operation Fortress.

In August 2026 he described Reform's proposal as lacking substance and questioned using expensive warships configured for anti-air and anti-submarine warfare for what is essentially a transport/interception task.

His concise formulation is difficult to improve upon: "You're better off using an actual ferry."

Admiral Lord West, a former First Sea Lord, reached the same underlying conclusion from a different direction in 2025. He said naval deployment makes "no difference at all" unless Britain is permitted to return those intercepted.

Former First Sea Lord Admiral Sir George Zambellas warned Parliament in 2022 that increasing at-sea assets would improve surveillance and rescue but was unlikely, by itself, to reduce sailings.

These are not identical arguments. Sharpe focuses on platform suitability and operational risk; West on the missing return power; Zambellas on deterrence. Together they expose three different assumptions inside Operation Fortress.

Naval voice	Relevant experience	Core warning
Cmdr Tom Sharpe OBE (ret.)	Former Royal Navy commander; Operation Isotrope witness	Warships are poorly matched to the task; more ships can increase safety without solving deterrence
Admiral Lord West of Spithead	Former First Sea Lord	Interception achieves little if return to France is unavailable
Admiral Sir George Zambellas	Former First Sea Lord	More at-sea assets increase surveillance/rescue but are unlikely alone to deter sailings
Vice-Admiral Sir Charles Montgomery (ret.)	Former Second Sea Lord; former Border Force Director General	Warned in Operation Isotrope evidence about risks and the danger of making the route safer/more attractive

7. The Wrong Ship Problem

A Type 45 destroyer or modern frigate can detect and track small craft. That does not make it an efficient platform for close interaction with overloaded inflatables.

High-end warships exist for air defence, anti-submarine warfare, escort, deterrence and combat operations. Diverting them to routine migration interception imposes opportunity costs even where the ship can technically perform surveillance.

Smaller craft are better suited to close manoeuvre, but that shifts rather than removes the problem: crews still face collision risk, wash effects, transfer risk and the duty to respond if people enter the water.

Operation Fortress therefore needs an asset plan, not simply the phrase “Royal Navy”. It should specify which vessels perform surveillance, which make close approaches, which recover large numbers of people and which defence tasks are displaced.

8. Overloaded Inflatables Change the Rules of Manoeuvre

Small-boat crossings commonly involve craft carrying numbers far beyond those for which ordinary leisure inflatables are designed. The consequences of aggressive manoeuvring are therefore unlike intercepting a conventional vessel.

Wake, sudden course changes, panic, movement of passengers, engine failure or puncture can rapidly turn an interception into a mass-rescue event.

That does not mean a state can never direct or intercept a small craft. It means tactics have to be conditioned on safety of life at sea.

The previous Government itself acknowledged this in 2022 when it said turnaround tactics could be used only in limited circumstances because preservation of life took priority.

9. The 173-Person Capsize Is the Stress Test

The August 2026 incident in which a dinghy carrying 173 people capsized after its engine caught fire provides an unusually stark real-world test.

A policy cannot assume that an intercepted boat will remain a stable platform while political and diplomatic decisions are made. Fire, flooding, engine failure and overcrowding can convert the situation in seconds.

For a naval commander confronted with that scenario, the immediate task is not to determine whether France or Britain has the stronger immigration argument. It is to prevent mass drowning.

Any Operation Fortress rules of engagement therefore need to be written for the worst plausible boat, not the idealised cooperative one.

10. “Just Tow It Back” Is Not a Complete Tactic

Towing is often presented as an obvious solution. It is not self-executing.

A tow requires a craft capable of being towed safely, a secure connection, weather and sea conditions compatible with the operation, and a destination at which the tow can lawfully terminate.

If people remain aboard the inflatable, the Navy retains a safety problem throughout the tow. If they are transferred to the naval vessel, the inflatable is no longer the principal issue: the Navy is carrying rescued or intercepted people who still require disembarkation.

Towing therefore cannot solve the France-consent problem established in Section 5.4.

11. “Put Them in a Safer Boat and Send Them Back” Creates New Problems

Another proposed workaround is to transfer occupants into a more seaworthy craft and direct that craft toward France.

That raises immediate questions about who commands the replacement vessel, whether it is crewed, whether passengers can safely navigate it, what happens if they refuse, what flag and legal status the vessel has, and who is responsible if it later becomes distressed.

If British personnel crew the vessel to France, France still has to accept the disembarkation. If British personnel do not crew it, the state has deliberately placed civilians into a vessel and sent them across one of the world's busiest shipping corridors.

A serious military plan would need rules covering each of those contingencies.

12. Rules of Engagement Cannot Be a Slogan

Military operations work through defined authority, command chains and rules governing what personnel may do when a person refuses to comply.

Suppose a Royal Navy craft orders a dinghy to turn around and the occupants refuse. What coercive step follows? Blocking? Boarding? disabling the engine? towing? physical transfer?

Each escalation creates different risks. If no coercive step follows, the order is advisory. If coercion does follow, the Government must define the legal authority, safety threshold and limits on force.

The Defence Committee raised precisely this kind of uncertainty during Operation Isotrope, asking what capabilities the Navy added and what the rules of engagement would be.

THE REFUSAL TEST

Every "turn them around" policy should be asked one operational question: What exactly does the Royal Navy do when the people in the dinghy say no? The answer reveals whether the policy is surveillance, rescue, coercive interception or political theatre.

13. More Rescue Capacity Can Weaken Deterrence

The deterrence effect is not automatic.

During the 2022 Defence Committee inquiry, naval witnesses warned that increasing the number of ships and aircraft could make crossings safer by increasing surveillance and rescue opportunities.

That does not mean rescue should be withheld. It means deterrence cannot be assumed merely from the presence of naval uniforms and grey hulls.

For Operation Fortress to deter crossings, smugglers and passengers must believe interception reliably prevents arrival in Britain and results in another outcome. That returns the analysis to the disembarkation and readmission arrangements in Section 5.4.

14. Military Visibility Is Not Border Control

The Royal Navy can make the Channel look more controlled. That is not necessarily the same as changing the final destination of the people crossing it.

Surveillance is already extensive. Boats are routinely detected and tracked. The difficult part is not finding a large inflatable in one of the world's most monitored waterways.

The policy succeeds only if detection leads to an outcome materially different from the current one. If naval interception repeatedly ends with rescue and disembarkation in the UK, the uniform has changed but the migration outcome has not.

That is why Lord West's observation is so important: return capability, not simply naval presence, is the decisive variable.

15. Opportunity Cost to Defence

The Royal Navy does not possess unused ships waiting for an immigration mission.

The 2022 Defence Committee warned that adding Channel responsibilities could affect the availability of ships and personnel at a time when naval tasks were already increasing.

Operation Fortress is more ambitious than Operation Isotrope. A permanent joint military command involving the Navy, Royal Marines, RAF and Army would consume personnel, planning capacity, surveillance assets, maintenance and command attention.

The relevant fiscal question is therefore not merely what Operation Fortress costs. It is which existing defence activities are reduced, delayed or require additional funding to compensate.

16. A Naval Feasibility Matrix

Proposed function	Technically feasible?	Principal constraint	Assessment
Detect small boats	Yes	Persistent surveillance and coordination	Already substantially achievable
Approach/intercept	Yes	Safety and authority	Naval capability exists
Rescue people in distress	Yes	Capacity and safe disembarkation	Core maritime capability/duty
Order craft to reverse course	Sometimes	Compliance, safety, jurisdiction	Order alone does not guarantee outcome
Physically turn craft around	Limited circumstances	Capsize/collision/ distress risk	Historically judged too constrained for routine use
Tow craft toward France	Sometimes technically	Safety plus French reception	Not a unilateral solution
Carry rescued people to France	Technically	French consent / place of safety	Foreign-policy constraint

Proposed function	Technically feasible?	Principal constraint	Assessment
Use major warships routinely	Technically	Platform mismatch/opportunity cost	Poor efficiency case
Stop crossings within two weeks	Deployment may be rapid	Readmission and deterrence mechanism	Not demonstrated by naval deployment alone

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying the Royal Navy is legally incapable of intercepting any small boat; that every small boat is automatically in distress; that every turnaround manoeuvre would necessarily be unlawful; that naval personnel would refuse a lawful order from an elected government; or that military assets could add nothing to Channel operations. It also does not support the opposite claims: that warships can simply force dinghies back to France, that rescue law authorises unilateral French disembarkation, or that putting more naval assets in the Channel automatically deters crossings.

Policy Feasibility: From Political Promise To Practical Delivery

5.6 The Detention State: Building and Operating 24,000 Secure Places

EVIDENCE SUMMARY

Purpose: Test the physical estate behind Reform UK's proposed mass-removal programme. Reform has repeatedly committed to detention capacity for at least 24,000 people, with Zia Yusuf saying the spaces would be created "very quickly" and the wider policy describing delivery within roughly 18 months.

Finding: The scale is transformative. The Home Office reported approximately 2,480 immigration-detention beds in June 2025; 24,000 would therefore represent almost ten times that capacity. Current government expansion at Campsfield and Haslar illustrates the infrastructure involved: secure accommodation, guarding, welfare, healthcare, local escorting, hospital watches, facilities management, recreation, cleaning and extensive supporting buildings.

Most importantly, the capital arithmetic is difficult to reconcile with available UK benchmarks. Reform's reported £2bn construction allocation equals about £83,333 for each of 24,000 places. Early Home Office estimates for Campsfield and Haslar were £240m–£260m for 1,000 places — approximately £240,000–£260,000 per place before inflation, optimism bias and contingency. Applying that benchmark mechanically to 24,000 places would imply roughly £5.76bn–£6.24bn of capital expenditure, not £2bn. This is not a forecast of Reform's eventual cost: scale, site reuse and specification could change unit costs. It is, however, a large benchmark gap requiring explanation.

Executive Brief

Reform's 24,000-place target is not an incremental expansion of the existing detention estate. In June 2025 the Home Office said national immigration-detention capacity was approximately 2,480 beds. Reform's target is about 9.7 times that figure.

The current Government describes the addition of roughly 1,000 beds at Campsfield and Haslar as contributing to a 40% increase in UK detention capacity. Reform proposes twenty-four times that 1,000-bed expansion.

Existing Home Office projects also show that an immigration removal centre is not simply a dormitory behind a fence. Operator specifications include site management, security and guarding, welfare and care, local escorting, hospital bed watches, furniture and equipment, facilities

management, cleaning, education, recreation and landscaping. Healthcare is separately procured through NHS arrangements at Campsfield.

Early official capital estimates for the two reopened sites were £90m–£100m for 400-place Campsfield and £150m–£160m for 600-place Haslar. Combined, that is £240m–£260m for 1,000 places — £240,000–£260,000 per nominal place — and the Home Office explicitly said those estimates excluded inflation, optimism bias and contingency.

Reform's reported £2bn construction allowance for 24,000 places is £83,333 per place. The historic Home Office benchmark is therefore roughly 2.9–3.1 times higher before the excluded uplifts.

Operating costs are also substantial. The original procurement notices estimated eight-year operator contracts of £170m for Campsfield and £229m for Haslar: £399m across 1,000 places, or an average contract value of almost £50m a year. A simple scale-up to 24,000 places would be about £1.2bn a year in operator-contract value alone. That is an illustrative benchmark, not a forecast, and does not establish what a differently designed Reform estate would cost.

Time is a second constraint. Campsfield's reopening and expansion demonstrate the sequence: design, planning, procurement, refurbishment/construction, operator procurement, healthcare procurement, commissioning and phased opening. Campsfield opened Phase 1 with only 160 beds in December 2025; Phase 2 for another 240 beds remained a live planning/development process in 2026.

The conclusion is therefore not that 24,000 places are impossible to build. Governments can construct secure estates if Parliament supplies enough money, land and legal authority. The question is whether Reform's published money and timetable describe the same estate as its published capacity.

1. Start With Scale

Measure	Approximate capacity	Comparison with Reform target
UK immigration detention capacity, June 2025	~2,480 beds	Baseline
Campsfield Phase 1, opened Dec 2025	160 beds	0.7% of Reform target
Campsfield planned total	400 beds	1.7%
Haslar planned total	600 beds	2.5%
Campsfield + Haslar planned total	1,000 beds	4.2%

Measure	Approximate capacity	Comparison with Reform target
Reform target	24,000 beds	~9.7× June 2025 national capacity

The comparison is important because “24,000 detention spaces” can sound like a large accommodation procurement. In institutional terms it is the creation of a new national secure estate.

On 31 March 2026 only 1,955 people were actually being held under immigration powers across detention facilities and prisons. A fully occupied 24,000-place system would therefore hold more than twelve times the snapshot detained population recorded at that date.

Section 5.3 showed that this capacity could, in principle, support Reform’s removal throughput if cases turn over rapidly. Section 5.6 asks what must physically exist before those beds can be used.

2. £2 Billion Means £83,333 Per Place

Contemporary reporting on Operation Restoring Justice allocated approximately £2bn of Reform’s five-year implementation budget to construction of detention capacity.

Dividing £2bn by 24,000 places produces an implied capital allowance of approximately £83,333 per place.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

The correct comparator is therefore secure institutional capacity, preferably immigration detention itself.

THE CAPITAL QUESTION

If £2bn is intended to fund the entire 24,000-place secure estate, Reform is budgeting approximately £83,333 of construction capital per place. The burden is then to show which sites, specifications, land assumptions and construction methods make that figure achievable.

3. The Home Office Has Already Published a Comparator

In November 2022 the Government gave Parliament early estimates for reopening and redeveloping Campsfield and Haslar.

Campsfield was estimated at £90m–£100m. Haslar was estimated at £150m–£160m.

The planned operating capacities were subsequently specified as 400 at Campsfield and 600 at Haslar.

On those figures, Campsfield's early capital estimate equates to roughly £225,000–£250,000 per place and Haslar's to roughly £250,000–£266,667 per place.

Across the two sites the combined benchmark is £240,000–£260,000 per place.

Crucially, the ministerial answer said those early estimates excluded potential inflation, optimism bias and contingency. They should therefore not be presented as final outturn costs.

Project	Planned places	Early capital estimate	Implied capital per place
Campsfield	400	£90m–£100m	£225,000–£250,000
Haslar	600	£150m–£160m	£250,000–£266,667
Combined	1,000	£240m–£260m	£240,000–£260,000
Reform implied allowance	24,000	£2bn	£83,333

4. The Benchmark Gap

The difference is too large to ignore.

At £240,000 per place, 24,000 places would imply £5.76bn. At £260,000, the figure becomes £6.24bn.

That is £3.76bn–£4.24bn above the reported £2bn construction allocation.

Equivalently, the official combined benchmark is approximately 2.9–3.1 times Reform's implied per-place allowance.

This does not prove Reform would spend £5.76bn–£6.24bn. A national programme could achieve economies of scale; military or government land might reduce acquisition costs; modular construction might reduce some build costs; specifications could differ; and the 2022 sites involve refurbishment as well as new construction.

But those possibilities are hypotheses. Reform needs to quantify them. A cost reduction of roughly two-thirds relative to the available immigration-detention benchmark is not something that should be assumed without a site and design model.

CAUTIOUS CONCLUSION

£5.76bn–£6.24bn is a benchmark extrapolation, not "the true cost" of Reform's detention estate. Its evidential value is the size of the gap: Reform's published allowance appears to require a dramatically lower unit cost than the Home Office's own recent detention projects.

5. Reusing Military Sites Does Not Make Them Free

Reform has discussed military sites as locations for detention infrastructure. Public ownership can reduce or remove a land-purchase price, but it does not remove conversion costs.

A secure immigration centre requires a useable perimeter, accommodation meeting detention standards, fire and life-safety systems, water and sewerage, electricity, communications, healthcare space, kitchens or catering infrastructure, visits and legal-access space, recreation, staff facilities, controlled vehicle access and secure movement arrangements.

Some former military sites will already possess useful infrastructure; others will require major remediation or reconstruction. Site condition therefore matters more than the label “military”.

There is also an opportunity cost where Defence still values the land. A site transferred to the Home Office is no longer available for training, housing, storage, mobilisation or future defence expansion without replacement.

6. Campsfield Shows What “Very Quickly” Looks Like in Practice

Campsfield is useful because it is not a greenfield theoretical project. It was a former immigration removal centre, so the state began with an existing detention site and institutional history.

Even so, redevelopment was phased. Phase 1 opened on 1 December 2025 with 160 beds. The planned Phase 2 adds 240 beds to reach 400.

In June 2026 the Phase 2 expansion was still going through the Crown development planning process. The Home Office told Parliament that construction costs had not yet been finalised and would be subject to Treasury approval through the Full Business Case.

That sequence matters. Reform’s target is not one Campsfield. It is the equivalent of sixty 400-place Campsfields, forty 600-place Haslars, twenty-four 1,000-place centres, twelve 2,000-place centres — or some mixture of these.

The larger the individual site, the fewer procurements are required, but the greater the local infrastructure, planning, security, staffing and resilience consequences of each project.

Illustrative estate design	Number of sites needed for 24,000 places
400-place centres	60
600-place centres	40
1,000-place centres	24
1,500-place centres	16
2,000-place centres	12
3,000-place centres	8

7. Planning Can Be Changed; Construction Still Takes Time

Reform has proposed legislation intended to prevent local opposition from blocking the detention programme. A government with a Commons majority could attempt to create special planning or Crown-development routes.

That could reduce one source of delay. It cannot eliminate architectural design, surveys, procurement, utilities work, construction sequencing, fire certification, security testing, healthcare commissioning, recruitment, training and operational commissioning.

The distinction matters because political debate often treats “planning permission” as synonymous with “delivery time”. It is only one stage.

Even emergency programmes need safe buildings, functioning services and people to operate them.

8. The Operator Contract Reveals the Hidden Institution

The procurement description for Campsfield and Haslar is a useful checklist of what a detention centre actually buys.

The Home Office sought contractors not merely to guard bedrooms but to provide overall site management; security and guarding; welfare and general care; local escorting and hospital bed watches; furniture and equipment; facilities management and cleaning; educational and recreational services; and landscaping.

That list still does not encompass every public cost. Healthcare at Campsfield, for example, is separately procured through NHS England.

The 24,000-place proposal therefore requires multiple parallel supply chains: custody, healthcare, catering, transport, maintenance, cleaning, communications, welfare, interpreters, legal access and secure logistics.

9. Operating Costs Could Rival the Capital Budget

The 2022 procurement estimated an eight-year operator-contract value of £170m for 400-place Campsfield and £229m for 600-place Haslar.

Together that is £399m over eight years for 1,000 places — an average of approximately £49.9m a year.

Expressed against nominal capacity, that is roughly £49,875 per place per year in operator-contract value.

A purely mechanical scale-up to 24,000 places gives approximately £1.197bn a year, or nearly £6bn across five years.

That extrapolation must be treated cautiously. Contract prices change; occupancy matters; scale may create efficiencies; specifications differ; and the old procurement figures are not the same thing as a current all-in cost per detainee.

But it establishes the order of magnitude: operating a secure estate is not a minor expense that ends when the buildings open.

Illustrative calculation	Value
Campsfield + Haslar operator contracts	£399m over 8 years
Average annual value	~£49.9m/year
Nominal capacity	1,000 places
Average contract value per place/year	~£49,875
Mechanical 24,000-place equivalent	~£1.197bn/year
Mechanical five-year equivalent	~£5.985bn

DO NOT DOUBLE-COUNT

These operating-contract figures should not simply be added to every other Reform budget line without checking scope. The purpose of the calculation is to expose the likely scale of recurring detention operations, not to manufacture a headline total by combining overlapping cost categories.

10. Healthcare Is Core Infrastructure

Immigration detention is a custodial healthcare environment, not ordinary accommodation.

Campsfield's 2025 opening statement confirmed that healthcare provision was separately procured by NHS England.

The detained population can include people with chronic conditions, acute illness, mental-health needs, disabilities, trauma histories, substance-dependence issues and people requiring hospital treatment.

Scaling to 24,000 places therefore creates a significant healthcare workforce and commissioning requirement. Reform's implementation plan should identify whether those costs sit inside the detention budget, NHS budgets or another programme line.

11. Staffing Is More Than Guards

A secure estate cannot be commissioned by constructing beds first and recruiting later.

Operational roles include custody officers, managers, healthcare staff, welfare teams, maintenance, cleaning, catering, reception/discharge staff, transport and escort personnel, interpreters, activities staff, security intelligence, safeguarding functions and administrative support.

Inspection evidence shows why staffing ratios matter. HM Inspectorate of Prisons reported that Harmondsworth had received the worst-ever IRC judgements in 2024; by February 2025 substantial investment had doubled staff levels and helped produce major improvements.

That is an important warning against treating staffing as the easiest line to compress. A cheap centre with insufficient personnel can become an unsafe and ultimately more expensive centre.

12. Conditions Are an Operational Variable, Not Just a Moral Argument

Poor conditions can reduce throughput rather than increase it.

Violence, self-harm, medical crises, disorder, drugs, infrastructure failures and inadequate legal access consume staff time, create hospital escorts, generate litigation and inspection interventions and can lead to temporary loss of usable capacity.

HM Inspectorate of Prisons has repeatedly scrutinised immigration centres for precisely these issues. At Harmondsworth, the 2025 review credited substantial investment, doubled staffing and refurbishment with reversing severe deterioration.

For a 24,000-place estate, resilience must therefore be designed in. Nominal beds are not the same as reliably operational beds.

13. Location Is an Operations Decision

Reform's later proposal to prioritise Green-held areas for detention centres introduces a political site-selection criterion into what should also be a logistics exercise.

An efficient removal centre needs transport access, sufficient utilities, a recruitable workforce, healthcare links, secure vehicle routes and practical access to airports or other departure infrastructure.

A location chosen principally to reward or punish voting behaviour may not be the location that minimises construction cost or removal time.

This creates a measurable policy question: will sites be selected through an operational optimisation model or a political map? If both criteria apply, which takes precedence when they conflict?

SITE-SELECTION PROBLEM

The cheapest bed is not necessarily the cheapest removal. A remote centre with low land costs can create higher escort mileage, staffing difficulties, hospital-transfer costs and airport-transport time. Whole-system cost matters more than construction cost alone.

14. Families Change the Specification

Reform has said its programme would encompass women and children as well as men.

That matters because the present large IRC estate is heavily oriented toward adult men, while family detention engages different accommodation, safeguarding, education, healthcare and welfare requirements.

A 24,000-place headline therefore cannot be modelled as 24,000 identical beds.

The estate plan needs an assumed population mix: adult men, adult women, families, vulnerable people and any specialist or separation capacity required. Changing that mix changes both capital design and staffing.

15. Turnover Creates a Transport Network

Section 5.3 established that Reform's detention arithmetic depends on rapid turnover. That means the estate is not static accommodation; it is a high-volume logistics network.

At 120,000 completed removals a year, an average of roughly 329 people must leave the country each day. Others must simultaneously be arrested or transferred into detention to keep the pipeline populated.

Every turnover can generate secure transport between arrest locations, police/prison custody, detention centres, hospitals, airports and sometimes consular interviews.

Consequently, a 24,000-place estate requires a national fleet and escort workforce capable of moving people continuously. The operator specification's inclusion of local escorting and hospital watches is only one part of that network.

16. The 18-Month Test

The most demanding claim is not ultimately the number 24,000. It is the combination of 24,000 and rapid delivery.

If all 24,000 places had to be available within 18 months, the programme would need to commission an average of about 1,333 places per month from programme start.

That is approximately 308 places per week.

For comparison, Campsfield Phase 1 opened with 160 places and Phase 2 adds 240. The required national delivery rate would therefore be equivalent, on average, to opening more than three complete 400-place Campsfields every month for eighteen consecutive months.

Parallel construction can make national programmes much faster than sequential projects. But parallelism multiplies procurement, project-management, workforce and supply-chain demand.

Reform should therefore publish a mobilisation schedule showing how many sites begin design on day one, when planning/design powers take effect, when contracts are let, and how capacity ramps month by month.

18-month delivery arithmetic	Required average
Total places	24,000
Places per month	~1,333
Places per week	~308
400-place-centre equivalents/month	~3.33
600-place-centre equivalents/month	~2.22
1,000-place-centre equivalents/month	~1.33

17. What Could Make Reform Cheaper Than the Benchmark?

A fair analysis should identify the ways Reform might genuinely reduce costs rather than assuming current government procurement is optimal.

Large-scale modular construction could reduce design repetition and build time. Standardised centre designs could lower professional fees. Government or military land could reduce acquisition costs. A larger procurement could create purchasing power. Simpler finishes and concentrated sites could lower some unit costs. Reusing existing secure estates could avoid parts of the perimeter and infrastructure bill.

But each saving has a boundary. Modular buildings still require secure sites and utilities. Government land has an opportunity cost. Larger centres concentrate risk and require larger local workforces. Reuse is limited by the number and condition of suitable sites.

The correct approach is therefore to ask Reform to publish the engineering assumptions that convert those potential efficiencies into an £83,333-per-place capital number.

18. What Could Make It More Expensive?

- Inflation and construction-market capacity.
- Remediation of former military or brownfield sites.
- Utility upgrades and new sewerage, electricity or road capacity.
- Security redesign after operational testing.
- Planning or legal delay even under accelerated procedures.
- Healthcare and safeguarding requirements for a mixed population.
- Recruitment premiums in remote locations.
- Contractor risk pricing for an accelerated national programme.
- Contingency for disorder, fire, damage, refurbishment and temporarily unusable accommodation.
- Replacement costs for defence land or infrastructure transferred to the detention programme.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying 24,000 detention places are physically impossible; that every new place must cost exactly the same as Campsfield or Haslar; that £5.76bn–£6.24bn is the definitive construction bill; that military land cannot reduce costs; or that planning reform cannot accelerate delivery. Nor does it support treating £2bn as demonstrated to be sufficient. The available benchmark is far higher, and Reform has not yet published the site-by-site engineering and procurement model needed to reconcile the difference.

Policy Feasibility: From Political Promise To Practical Delivery

Evidence-based public interest review • 13 August 2026

5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State

EVIDENCE SUMMARY

Purpose: Examine how Reform UK proposes to convert an estimated population of people without current leave into named, located and legally actionable individual cases. The party's own plan proposes a UK Deportation Command and an Illegal Migrant Identification Centre built around "cutting edge data fusion", automatic data sharing between the Home Office, NHS, HMRC, DVLA, banks and police, bulk warrants, and mandatory biometric capture during police encounters.

Finding: Much of the proposed machinery is an expansion of powers and technologies that already exist in narrower form. Immigration Enforcement already conducts more than 17,000 workplace visits in 18 months, uses warrants and administrative arrest powers, retains fingerprints and facial images, and has trialled live facial recognition. The challenge is not inventing enforcement from nothing; it is scaling it safely from targeted intelligence-led activity to a system expected to identify and process hundreds of thousands of people.

Central risk: a mass data-fusion model moves the principal failure mode from "we cannot find enough people" to "we identify the wrong people, act on stale or incomplete records, or impose enforcement consequences before status is correctly resolved". Britain has already experienced the consequences of immigration enforcement built around imperfect records in the Windrush scandal. A programme this large therefore requires accuracy, redress and human review to scale at least as quickly as coercive power.

Executive Brief

Reform's published Operation Restoring Justice document is unusually explicit about the enforcement state it intends to build. It proposes a UK Deportation Command containing an Illegal Migrant Identification Centre that would automatically share data between the Home Office, NHS, HMRC, DVLA, banks and police.

The policy also proposes "bulk warrants", mandatory biometric capture during any police encounter, and powers intended to correct what Reform describes as existing failures where banks or GPs may be unaware of immigration status or warrants cover only a single property.

That is a much more significant policy than simply increasing the number of immigration officers. It is an attempt to create a cross-government identity-and-location system whose output is arrest and detention.

The current state already possesses important building blocks. Immigration Enforcement conducts intelligence-led visits, can apply for and execute warrants under immigration legislation, uses administrative arrest powers for removal, retains immigration fingerprints and facial images, and began live facial-recognition deployments in 2025.

Current enforcement has already reached historically high levels. Between July 2024 and December 2025, Immigration Enforcement conducted more than 17,400 business visits and made more than 12,300 arrests in illegal-working operations.

That scale is nevertheless small relative to Reform's stated ambition. Even if 600,000 were a perfectly accurate population estimate, the state would still need to resolve six hundred thousand separate questions of identity, status, address, removability and destination. A population estimate is not a warrant list.

The key technical issue is data quality. The Home Office itself operates services for people whose immigration status has been recorded or shared incorrectly, including errors that block work, benefits, banking or other services. eVisa errors can also show the wrong personal details or immigration status.

The historical warning is Windrush. The independent review found that lawful residents and British citizens were caught by enforcement measures designed for people without lawful status because records were incomplete, documentary burdens were mishandled and the department failed to join up evidence of harm.

That does not mean a future data-fusion system must repeat Windrush. It means the burden of proof for a mass-identification system is not merely whether it can generate matches. It must demonstrate that the matches are accurate enough, current enough and reviewable enough to justify coercive consequences.

1. Reform's Plan Is Explicitly a Data-Fusion Programme

The operational plan does not leave the identification mechanism vague.

Reform says its proposed Illegal Migrant Identification Centre would "relentlessly identify and detain" people without lawful status using automatic information sharing across the Home Office, NHS, HMRC, DVLA, banks and police.

It also proposes mandatory biometric capture during police encounters and bulk warrant powers intended to avoid having to secure narrowly property-specific authority in repeated cases.

Those proposals matter because they shift the policy from conventional immigration enforcement toward a much broader model in which interactions with banks, healthcare, taxation, driving, policing and other public or regulated systems may contribute to immigration enforcement intelligence.

Proposed data source / mechanism	What it could reveal	Why accuracy matters
Home Office	Status, applications, immigration history, biometrics	Records may be incomplete, pending or complex

Proposed data source / mechanism	What it could reveal	Why accuracy matters
HMRC	Employment/tax footprint	Work activity does not by itself establish current immigration status
DVLA	Identity/address/vehicle links	Addresses can be historic; driving records are not immigration decisions
Banks	Identity/address/financial activity	False status flags can affect lawful customers
NHS	Identity/contact/service interaction	Health records raise particularly sensitive data and trust questions
Police	Encounters, identity checks, custody information	Police contact does not imply immigration breach
Biometrics	Identity linkage across records	High confidence identity does not itself answer lawful-status question
Live facial recognition	Possible location of watchlisted individual	A match is an investigative alert, not a legal status decision
Bulk warrants	Entry/arrest/search capability at scale	Judicial safeguards and specificity determine legitimacy

2. The Existing System Is Already Highly Coercive

It is important not to describe Reform's programme as though Britain currently lacks immigration-enforcement powers.

Home Office guidance already provides administrative powers where the purpose is removal rather than criminal prosecution. Immigration officers can conduct enforcement visits, arrest in specified circumstances, search and seize under statutory powers and obtain warrants from a justice of the peace or sheriff.

A warrant can authorise arrest of a specified person, entry to specified premises to arrest that person, or entry/search for evidence or relevant documents, depending on the statutory power used.

Current enforcement visits must be planned and authorised, and officers deploying on visits are required to maintain arrest training.

Reform's proposal is therefore principally about scale, integration and threshold — not the invention of the concept of an immigration raid.

3. Raids Are Already at Record Levels

The current Government has already expanded illegal-working enforcement aggressively.

Home Office figures published in January 2026 reported more than 17,400 raids or enforcement visits to businesses between July 2024 and December 2025, with more than 12,300 arrests.

The department described that as a 77% increase in raids and an 83% increase in arrests compared with the equivalent preceding period.

This provides a useful operational baseline. If Reform wants to locate hundreds of thousands of people through raids, the comparison is not with zero enforcement. It is with a system already operating at record intensity.

THE SCALE QUESTION

17,400 workplace visits in 18 months is already described by the Home Office as record enforcement. Reform's 600,000-person ambition cannot be delivered simply by multiplying raids unless it specifies how many visits, officers, warrants and arrests it expects each year — and how many of those arrests actually become completed removals.

4. A Population Estimate Is Not a List of Names

Estimates of the irregular or unauthorised migrant population are statistical estimates, not an administrative inventory.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

That distinction is essential. A government can believe 600,000 people fall within a target population and still know the identity and current location of only a fraction at any given time.

Operationally, the programme must convert an uncertain stock estimate into hundreds of thousands of individual case files. Each file then has to survive the legal and documentation tests examined in Sections 5.1–5.4.

5. Status Is Not Binary in the Database

Immigration status can be legally simple in some cases and highly contested in others.

A person may have an outstanding application, appeal, fresh claim, administrative-review issue, unresolved identity question, pending documentation, historic status not correctly digitised, or a lawful status that is recorded incorrectly.

The Home Office currently provides a formal service for people who believe the wrong immigration status has been shared with another government department or a bank, or where an incorrect status has prevented access to work, benefits or services.

The eVisa system similarly provides an error-reporting route where a digital record shows the wrong personal details or immigration status.

The existence of these correction systems does not show that Home Office data is generally unreliable. It shows something more important for a mass-enforcement design: data error is a recognised operational category and must be engineered into the process.

6. Identity Accuracy and Status Accuracy Are Different

Biometric systems are strong at answering particular identity questions. Fingerprints and facial images can help establish that records relate to the same person and can reveal use of different identities.

Home Office guidance says fingerprints and facial images underpin identity assurance and can be checked against immigration, security and policing records.

But accurately identifying a person does not establish that the Government's legal conclusion about that person is accurate.

A fingerprint can say "this is the person in record X". It cannot by itself say whether an undecided application, historic right, statutory protection or database error makes removal lawful.

The policy therefore requires two quality systems: identity assurance and status/casework assurance.

7. Live Facial Recognition Is No Longer Hypothetical

Immigration Enforcement began publishing information about its use of live facial recognition in 2025.

The technology compares faces from a live camera feed against a predetermined watchlist and generates an alert when the system identifies a possible match.

That makes Reform's proposed biometric enforcement state technologically more plausible than it would have been only a few years ago. The infrastructure and legal debate are already developing.

It also creates a crucial safeguard question: what happens after an alert? A facial-recognition alert should lead to verification and lawful decision-making, not automatic detention merely because software produced a similarity score.

8. Accuracy and Bias Are Live Regulatory Issues

Facial recognition is not simply a faster identity card.

The Information Commissioner has stressed that accuracy, staff training and safeguards against bias are central to lawful and trusted use. In 2026 the ICO reported that Essex Police had paused live-facial-recognition deployments after identifying potential accuracy and bias risks.

The ICO also noted that the Home Office had identified historic bias in an algorithm used for retrospective facial-recognition searches on the Police National Database.

These findings concern policing systems rather than Reform's hypothetical Deportation Command, and they do not establish that a future system would be discriminatory. They do show that biometric error and demographic bias are engineering and governance risks that cannot be wished away by calling the technology "cutting edge".

BIOMETRIC RULE

A biometric match is evidence about identity, not a final immigration decision. The higher the coercive consequence attached to a match, the stronger the requirement for human verification, documented reasoning and rapid correction.

9. "Mandatory Biometric Capture During Any Police Encounter" Is a Major Expansion

Reform's own policy proposes mandatory biometric capture during any police encounter.

That phrase deserves far more scrutiny than it has received. "Police encounter" can describe situations ranging from arrest and custody to traffic stops, witness contact, safeguarding incidents or other interactions depending on how legislation is drafted.

A system applying immigration biometric capture automatically to a broad universe of encounters would convert ordinary policing into a major intake channel for immigration enforcement.

The operational consequence would be enormous: devices, secure transmission, identity resolution, watchlist checking, officer training, data-retention rules, audit trails and processes for people whose records indicate no immigration problem.

The legal design would need to define precisely which encounters trigger collection, what can be taken, whether refusal is an offence, retention periods, permitted secondary uses and the safeguards for British citizens and people with lawful status.

10. NHS Data Is a Particularly Sensitive Proposal

Reform explicitly includes the NHS in its proposed automatic data-sharing network.

That could potentially improve address or identity information, but health data occupies a different category from ordinary administrative records because people disclose information to obtain medical care.

The policy question is therefore not simply whether government can legislate to permit information sharing. It is what information is necessary and proportionate, under what trigger, and whether enforcement use could deter people from seeking treatment.

Public-health and safeguarding consequences would need to be assessed separately from the immigration-enforcement benefit.

A credible plan should distinguish basic identity/contact verification from access to clinical information. There is no obvious operational justification for a deportation unit to receive medical details unrelated to identity, removability or fitness for detention/removal.

11. Banks, Employers and the Risk of Automated Consequence

Bank and employer checks already form part of the wider immigration-status environment.

The Home Office's own status-correction service explicitly recognises cases where an incorrect immigration status has been shared with a bank or has stopped somebody working or accessing services.

That illustrates a general systems problem: when one government record is distributed to many institutions, a single error can create multiple consequences before the individual manages to correct it.

Reform's proposed automatic data fusion would operate in the opposite direction as well — drawing signals from multiple institutions back into enforcement.

The larger the network, the greater the need to distinguish corroboration from duplication. Five databases repeating the same incorrect source record do not constitute five independent pieces of evidence.

12. Windrush Is the Relevant Systems Failure

Windrush is relevant here not as a rhetorical comparison but as a documented failure mode.

The independent Windrush Lessons Learned process found that people lawfully in Britain — including British citizens — became caught in enforcement measures intended for people without lawful status because the department lacked or mishandled records, imposed excessive documentary burdens and failed to learn from accumulating evidence of error.

The subsequent progress review described an extremely complex data landscape in which information was held by the Home Office, third parties or not held at all. It also noted continuing inconsistency in casework and examples where incorrect decisions were communicated before specialist review corrected them.

That is precisely the sort of systemic risk a mass data-fusion programme must design against.

The lesson is not "never enforce immigration law". It is that political urgency, data gaps and automated or checklist-style decision-making can combine to produce severe harm to lawful residents.

WINDRUSH TEST

Before a 600,000-person programme is operational, it should be able to answer a simple question: what prevents a lawful resident with an incomplete, historic or erroneous digital record from moving automatically from "database match" to "raid, arrest and detention"?

13. Bulk Warrants Need Definition

Reform says its new powers would support bulk warrants and criticises a system in which a warrant may cover only a single property.

Existing Home Office guidance treats warrants as judicial documents linked to specified purposes, persons or premises and warns officers to obtain the correct warrant for the intended statutory purpose.

A proposal to broaden warrant scope is therefore not a minor administrative change. It alters the balance between enforcement efficiency and judicial specificity.

The term “bulk warrant” needs legislative detail: whether it means multiple addresses associated with one person, multiple people at one premises, classes of premises, or some other form of authority.

Without that definition it is impossible to assess proportionality, judicial workload or the risk of searches at wrong or outdated addresses.

14. Addresses Decay

Locating people at scale is harder than linking records because addresses become stale.

People move. Tenancies end. Employers change. Mail goes elsewhere. Shared houses contain unrelated residents. Business addresses and residential addresses can be confused. Some people deliberately avoid formal records.

Every enforcement visit based on historic information therefore has a probability of finding nobody, finding a different household or discovering that the person’s status has changed since the intelligence was generated.

That produces operational waste as well as civil-liberties risk. A data-fusion centre needs confidence scoring, recency rules and corroboration before scarce arrest teams are deployed.

15. Enforcement Productivity Must Be Measured by Removals, Not Arrests

Political announcements often emphasise the number of raids or arrests because they are visible enforcement outputs.

But Section 5.3 established that the target is completed removals.

A Reform Deportation Command should publish a funnel: intelligence leads → visits → persons encountered → arrests → detentions → cases confirmed removable → travel documents secured → removal attempts → completed removals.

Without that funnel, a dramatic increase in raids can coexist with a much smaller increase in actual deportations.

Stage	Metric a serious plan should publish	Reason
Data/intelligence	Unique people flagged; confidence level	Prevents counting duplicate database hits as people
Operational targeting	Addresses / workplaces selected	Measures intelligence quality

Stage	Metric a serious plan should publish	Reason
Visits	Completed enforcement visits	Shows resource use
Encounters	Target located / not located / wrong person	Measures address and identity accuracy
Arrests	Administrative / criminal arrests	Visible coercive output
Detention	Admissions following arrest	Measures conversion into removal pipeline
Case validation	Actually liable and presently removable	Separates arrest from legal deliverability
Documentation	Travel documents secured	Foreign-state throughput
Attempts	Scheduled removal attempts	Operational throughput
Completed returns	Person actually leaves UK	Policy outcome

16. False Positives Have a Capacity Cost Too

Wrongly targeting a lawful person is first a rights problem, but it is also an efficiency problem.

Every false positive consumes officer time, transport, custody capacity, caseworker attention and potentially detention space. At very large scale, even a low error rate can generate substantial workload.

For illustration, a 1% erroneous targeting rate across 600,000 resolved cases would mean 6,000 cases requiring correction. At 0.1%, it would still mean 600.

Those figures are not predictions of Reform's error rate. They show why accuracy must be specified numerically rather than described as "cutting edge".

17. Human Review Is the Bottleneck Reform May Actually Need

Data fusion is valuable because computers can connect records faster than humans.

But the final question — whether coercive action is justified against a particular person at a particular time — may require human judgement precisely because immigration histories can be legally complex.

This is a classic automation trade-off: technology can accelerate identification faster than institutions can safely adjudicate what the identification means.

The staffing plan must therefore include quality-assurance officers and escalation specialists, not only enforcement teams.

18. A National Data-Fusion Centre Becomes Critical Infrastructure

A system combining Home Office, police, banking, tax, DVLA, biometric and potentially health data would become one of the most sensitive state databases in Britain.

Its security therefore becomes part of the immigration policy.

Threats include insider misuse, unauthorised searches, cyberattack, bulk data theft, inaccurate data propagation and inappropriate use for purposes beyond those Parliament authorised.

The system would require access controls, audit logs, role-based permissions, retention policies, breach response, independent oversight and clear criminal or disciplinary consequences for misuse.

Centralisation creates efficiency, but it also concentrates harm if the system is compromised.

19. The Surveillance-State Description Needs Precision

“Surveillance state” is an emotionally loaded phrase, so the report should use it analytically rather than rhetorically.

Reform is explicitly proposing automatic cross-sector data sharing, biometric capture linked to police encounters and a central identification unit whose purpose is to locate people for detention and removal.

Those are objectively surveillance capabilities in the ordinary sense that the state would collect, link and analyse information about individuals to locate and act against them.

Whether the system is justified is a separate political and legal question. The evidence-based criticism is not that surveillance never has a legitimate law-enforcement purpose; it is that the scale and coercive consequences require correspondingly strong necessity, proportionality, accuracy and oversight safeguards.

20. What Could Make the System More Effective?

- Better integration of Home Office records and biometrics.
- High-quality address intelligence and recency scoring.
- Specialist teams for nationality and identity resolution.
- Faster correction of erroneous status records.
- Clear prioritisation of cases with valid travel documents and cooperative destination states.
- Voluntary-return offers before coercive enforcement.
- Data-sharing rules limited to information genuinely relevant to locating and establishing identity/status.
- Human quality assurance before arrest and detention.
- Independent auditing of biometric accuracy and demographic performance.
- Published conversion metrics from intelligence lead to completed return.

21. What Could Make It Fail?

- Duplicate or stale records interpreted as independent corroboration.
- Historic or incorrect status data.
- Addresses that are no longer current.

- Overbroad watchlists.
- Facial-recognition false alerts or demographic bias.
- Police or public-sector data being used outside the context in which it was collected without adequate safeguards.
- Insufficient caseworkers to review automated matches.
- Large numbers of arrests that do not convert into removals.
- Wrongful detention generating compensation, litigation and capacity loss.
- Foreign-documentation barriers that persist even after the correct person has been found.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying Reform intends to access everybody's full NHS clinical record; that every police encounter would necessarily involve fingerprinting under whatever legislation it ultimately drafted; that live facial recognition is inherently unlawful; that Home Office databases are generally wrong; or that Windrush proves all immigration enforcement is unsafe. Nor does it support the opposite simplification that data fusion can reliably identify 600,000 removable people merely because the records exist somewhere. The legal status, recency and accuracy of those records remain part of every individual case.

Policy Feasibility: From Political Promise To Practical Delivery

5.8 Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person

EVIDENCE SUMMARY

Purpose: Test Reform UK's explicit proposal to create a detention power "without Hardial Singh constraints" and to detain people until they are deported against the practical cases identified in Sections 5.3–5.4: people whose countries will not accept enforced return, whose identity cannot be documented, or whose removal timetable is fundamentally uncertain.

Finding: Hardial Singh is not a technical loophole that simply grants bail to people who might abscond. It is the common-law rule that links immigration detention to the statutory purpose for which Parliament authorised it. Current law already has no general fixed time limit, and section 12 of the Illegal Migration Act 2023 has already shifted part of the "reasonable period" assessment toward the Secretary of State. Even so, current Home Office guidance states that detention cannot lawfully continue where there is no realistic prospect of removal within a reasonable timeframe.

Central consequence: Reform's proposal removes the legal exit condition precisely for the cases in which the physical exit is unavailable. If a person cannot be removed because no country will receive them, no travel document can be obtained or no viable route exists, "detain until deported" becomes detention with no known end date. That is what indefinite detention means in this context: not necessarily permanent detention, but custody with no fixed or reliably foreseeable release date.

Executive Brief

Reform's own Operation Restoring Justice document is explicit: its proposed legislation would "Create Detention Power Without Hardial Singh Constraints", which it explains as meaning that people can be detained until they are deported.

That proposal is more radical than merely extending the current detention period. The UK already has no general statutory maximum for immigration detention. The legal constraint is instead purposive: detention must remain connected to a lawful statutory objective and must not continue beyond a reasonable period where removal is no longer realistically achievable.

The Home Office's June 2026 guidance says the Hardial Singh principles underpin detention decision-making and that lawful immigration detention requires a realistic prospect of removal within a reasonable timeframe. It also states that even after section 12 of the Illegal Migration Act 2023, detention cannot be maintained where there has ceased to be any prospect of removal within a reasonable period.

Section 12 has already strengthened executive discretion. It makes the Secretary of State the primary decision-maker on what period is reasonably necessary, subject to judicial review and other legal constraints. Reform is therefore not proposing to remove an untouched liberal rule: it is proposing to go beyond an existing statutory shift and remove the remaining link between detention duration and realistic removability.

The practical implications are exposed by Reform's own target population. Current Home Office material records returns to Afghanistan as paused; Eritrea as not accepting enforced returns; Iran and Syria as not accepting enforced returns in current statistics commentary; and other countries as requiring lengthy or uncertain documentation. These are precisely the cases in which detention may cease to have an achievable short-term endpoint.

The Supreme Court has repeatedly treated this connection between detention and realistic deportation as fundamental. In B (Algeria), once the tribunal found no reasonable prospect of removal to Algeria, the ordinary legal basis for detention was treated as having fallen away.

Reform could ask Parliament to legislate expressly against the common-law constraint. If Parliament used sufficiently clear language, the legal landscape would change. But the policy consequence would then need to be confronted honestly: the state would be authorising prolonged custody even in cases where it cannot say when, or potentially whether, removal will occur.

That creates a new fiscal and operational problem too. Every unremovable person occupying a detention place reduces the turnover on which Reform's 24,000-bed throughput model depends. Removing the legal pressure to release such cases may therefore make the physical deportation machine less efficient rather than more.

1. What Hardial Singh Actually Is

The Hardial Singh principles originate in common law and govern the use of statutory immigration detention powers.

In modern formulation, the principles require that detention be exercised for the statutory purpose; continue only for a period that is reasonable in the circumstances; end where it becomes apparent that the purpose — usually removal — cannot be achieved within that reasonable period; and be pursued with reasonable diligence and expedition by the state.

The point is not that a detainee acquires a free-standing right to remain in Britain. The point is that an administrative power to detain "pending removal" cannot be converted into a separate punishment or preventive sentence once the removal purpose ceases to be realistically achievable.

That distinction is constitutional as well as practical because immigration detention is ordered by the executive, not imposed as a criminal sentence after conviction.

Principle	Operational meaning
Purpose	Detention must be used for the statutory purpose for which the power exists
Reasonable period	Custody cannot continue longer than reasonably necessary in the circumstances
Prospect of removal	If removal cannot be effected within a reasonable period, continued detention should cease
Diligence	The state must act with reasonable diligence and expedition to achieve the statutory purpose

2. Britain Already Has No General Statutory Time Limit

The debate is sometimes framed as though Hardial Singh imposes a fixed maximum detention period. It does not.

Current Home Office guidance states that there is no general statutory time limit on immigration detention in the UK, while also stating that indefinite detention is not lawfully possible.

That is because current legality turns on purpose, prospect and reasonableness rather than a universal 28-day, 90-day or six-month cap.

A person can therefore already be detained for a substantial period where the circumstances justify it and removal remains realistically achievable. Conversely, a shorter detention can become unlawful if the statutory purpose cannot be achieved.

IMPORTANT DISTINCTION

Hardial Singh is not a fixed “bail after X days” rule. Reform’s own description of activist lawyers routinely using it to secure bail obscures the actual test: whether continued executive detention remains justified by a realistically achievable statutory purpose.

3. Parliament Has Already Weakened Part of the Old Framework

Section 12 of the Illegal Migration Act 2023 already altered the balance between executive and judicial assessment.

The statutory provisions allow detention for such period as, in the Secretary of State's opinion, is reasonably necessary to enable the relevant examination, decision, removal or directions to occur. They also clarify that temporary impediments do not automatically defeat the detention power.

Home Office guidance explains that this partly replaces the common-law second and third principles and overturns the earlier rule that the courts themselves make the primary assessment of whether there is a reasonable prospect of removal within a reasonable timescale.

But the same guidance is emphatic that section 12 does not authorise detention where there has ceased to be any prospect of removal within a reasonable period. Longer-term barriers still require release to be considered.

Reform's proposal therefore goes beyond section 12 by expressly targeting the constraint that remains when removability disappears.

4. Reform Says Exactly What It Wants to Change

The party's six-page Operation Restoring Justice document leaves little room for ambiguity.

Under its proposed Illegal Migration (Mass Deportation) Bill, Reform promises a detention power without Hardial Singh constraints and says this means people can be detained until deported.

The same document says its new Secure Immigration Removal Centres would enable "detention-on-arrest: no more bail".

Those statements should be read together. The stated policy is not merely to make bail harder in individual cases; it is to construct a 24,000-place estate around a legal assumption that detention can continue until removal is completed.

That makes the unremovable person the decisive stress test.

5. The Unremovable Person

Consider a person whom Reform's legislation places under a duty to remove but whose country of nationality will not currently accept enforced returns.

Under the existing Hardial Singh logic, detention may be justified while officials work to overcome a temporary obstacle. But if the obstacle becomes durable and there is no realistic prospect of removal within a reasonable period, continued detention ceases to be justified for that purpose.

Under Reform's stated model, the answer appears to be different: detention continues until deportation.

If the foreign state never agrees, the travel document never arrives, identity remains unresolved or the route remains unavailable, the detention endpoint is not a date. It is an uncertain future diplomatic event.

THE UNREMOVABLE-PERSON TEST

Ask Reform one question: If the Home Secretary orders the removal of a person to a country that refuses to receive them for three years, does that person remain detained for three years? If the answer is no, Reform needs a replacement release rule. If the answer is yes, the policy is prolonged executive detention without a fixed end date.

6. Afghanistan Makes the Problem Concrete

Afghanistan is not merely a theoretical example.

As established in Section 5.4, current Home Office country guidance records all enforced and voluntary returns to Afghanistan as paused and identifies no Afghan diplomatic mission accredited to the UK able to issue the relevant travel documents.

A future government may succeed in negotiating a new arrangement. Until it does, however, an Afghan national cannot be turned into a completed removal merely by changing UK detention law.

If such a person were detained under a "until deported" rule before a workable Afghan returns mechanism existed, the duration of detention would depend on the success and timing of future diplomacy.

That is precisely the kind of long-term external barrier current detention guidance says may make detention no longer reasonable or justified.

7. Eritrea, Iran and Syria Show This Is Not a One-Country Edge Case

The same structural problem appears with other nationalities.

Current Home Office material records Eritrea as not accepting enforced returns. The March 2026 returns statistics also note that Iran and Syria were not accepting enforced returns at that time.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

A policy that removes release constraints without first solving destination acceptance therefore risks accumulating detainees who consume capacity but do not produce removals.

8. The Supreme Court Has Already Confronted This Logic

B (Algeria) provides a particularly useful legal example because the dispute involved a person whom the state strongly wished to deport but could not realistically remove.

SIAC concluded that there was no reasonable prospect of removing B to Algeria and that the ordinary legal basis for immigration detention had therefore fallen away. The Supreme Court recorded that it was common ground that B could not lawfully continue to be detained on that basis.

The judgment also reiterates a fundamental common-law principle: Parliament is presumed not to interfere with personal liberty without making that intention clear.

Reform's policy appears designed to supply precisely that clear legislative intention. If so, the consequence cannot then be described as merely closing a procedural loophole; it is a deliberate alteration of the legal protection against detention after the removal purpose has ceased to be realistically deliverable.

9. Risk of Absconding Does Not Solve the Purpose Problem

Reform's justification is partly that people released on bail may abscond.

Absconding risk is a legitimate factor in detention and bail decisions. But current law does not treat it as an unlimited independent justification for immigration detention once removal has no realistic prospect.

The Supreme Court has recognised that there comes a point where, however serious the risk of absconding or offending, detention pending deportation can cease to be lawful because its statutory purpose can no longer be achieved.

If Reform wants detention to continue solely because a person is considered risky even where deportation is not realistically achievable, it is no longer relying purely on detention "pending removal". It is moving toward preventive detention based on future risk.

PURPOSE SHIFT

There is a legal and constitutional difference between "detained because removal is being actively arranged" and "detained because we do not want this person at liberty even though removal cannot presently occur". The second rationale requires Parliament to confront preventive detention directly rather than disguise it as a transport delay.

10. Bail Is an Alternative Control System, Not the Same as Release Without Conditions

Current immigration bail can impose reporting, residence, work or study restrictions and, where justified, electronic monitoring.

The First-tier Tribunal can grant immigration bail to detained people, and Home Office guidance explicitly contemplates bail where there is no realistic prospect of removal within a reasonable time.

This matters because the policy choice is not simply detention versus disappearance.

Reform may judge those mechanisms too weak for particular cohorts. But abolishing them requires evidence that the costs and risks of conditional release exceed the costs and risks of prolonged detention.

11. "No More Bail" Creates a Tribunal Question

Reform's operational document says its new detention capacity would enable "detention-on-arrest: no more bail".

That raises a separate institutional question from Hardial Singh.

Schedule 10 to the Immigration Act 2016 currently gives both the Secretary of State and, for detained people, the First-tier Tribunal powers relating to immigration bail, subject to statutory restrictions.

If Reform intends “no more bail” literally, its legislation would need to specify what happens to those statutory tribunal powers and automatic bail-referral mechanisms.

The design choice matters. Removing a common-law detention limit while leaving meaningful independent bail review is materially different from removing both the limit and the tribunal route.

12. Judicial Review and Habeas Corpus Do Not Disappear Merely Because the ECHR Does

Reform also proposes leaving the European Convention on Human Rights and repealing the Human Rights Act. That would remove or radically alter an important layer of detention protection, including Article 5 litigation.

But ECHR withdrawal is not the same thing as abolishing domestic public law.

Executive detention still requires statutory authority. Courts can examine whether powers have been used within the terms Parliament enacted, and the common law has historically treated personal liberty as requiring clear legislative authority.

Reform could attempt to legislate expressly to narrow those avenues too. The point is that “leave the ECHR” does not by itself produce unlimited detention power. The exact wording of the Mass Deportation Bill would determine how much judicial supervision remains.

This is another reason the promised legislation itself is indispensable evidence.

13. Detention Without an Exit Breaks the Throughput Model

The legal question connects directly to the arithmetic in Sections 5.3 and 5.6.

Reform’s 24,000-place estate can support 120,000 removals a year only if places turn over quickly. At roughly 73 days per completed cycle, the estate can theoretically match the annual target.

An unremovable detainee does not turn over.

If 1,000 places become occupied for a year by people who cannot be removed, effective high-throughput capacity falls from 24,000 to 23,000. If 5,000 places are tied up, the rapid-removal estate becomes a 19,000-place estate for operational purposes.

The policy therefore creates a possible feedback loop: removing release constraints increases long-stay occupancy; increased long-stay occupancy lowers turnover; lower turnover makes the 600,000-removal target harder to achieve; pressure then rises to construct still more detention capacity.

Long-stay places effectively unavailable for turnover	High-turnover places remaining	Approx. annual cycles at 73-day average
0	24,000	~120,000
1,000	23,000	~115,000
3,000	21,000	~105,000
5,000	19,000	~95,000

Long-stay places effectively unavailable for turnover	High-turnover places remaining	Approx. annual cycles at 73-day average
8,000	16,000	~80,000

14. Current Detention Outcomes Show Why Release Exists

The current estate does not operate as a conveyor belt in which detention almost always ends in deportation.

In the year ending March 2026, 22,586 people entered detention. Among those leaving detention, 9,916 — 44% — left in order to be returned from the UK.

The most common reason for leaving detention was immigration bail, accounting for 11,406 departures.

These figures do not show that the Home Office detained 11,406 people unlawfully. Bail can occur for many reasons and current policy deliberately uses alternatives to detention.

They do demonstrate that the present detention population contains a large volume of cases that do not move directly from cell to aircraft. Reform's "no more bail" approach must explain where those cases go instead.

15. Longer Detention Does Not Necessarily Produce More Removals

Current data also undermine the assumption that keeping somebody detained for longer automatically makes removal more likely.

Home Office statistics show that people actually returned from detention tend to have shorter detention periods: 71% of those returned in the year ending March 2026 had spent less than one month detained.

Longer cases are often longer precisely because there is an unresolved barrier.

That creates a selection effect: the people who remain for months may disproportionately be the people whose cases are difficult to resolve, whose documentation is delayed or whose removal is otherwise problematic.

A policy that simply refuses to release those people can increase detention duration without increasing removal probability.

THE LONG-STAY PARADOX

Some people are not unremoved because they were released too early; they are detained for longer because they are harder to remove. Extending detention does not itself solve the obstacle that made the case difficult.

16. Vulnerability Does Not Vanish Under a Mass Programme

Current policy contains an Adults at Risk framework because detention can aggravate physical and mental-health vulnerabilities.

Home Office guidance states that the policy strengthens the presumption against detention for people particularly vulnerable to harm and requires immigration factors to be weighed against that risk.

Reform's document proposes women and children within the wider mass-removal system and describes detention conditions as basic but not punitive.

If Hardial Singh constraints, bail opportunities and asylum/human-rights routes are simultaneously restricted, safeguarding becomes more rather than less important because the period of custody may become longer and harder to predict.

A complete Reform bill would therefore need to state which vulnerability protections remain, who can order release on medical or safeguarding grounds, and how those decisions interact with the promise of detention until deportation.

17. Indefinite Does Not Mean "Forever"

Precision matters because "indefinite detention" is often misunderstood.

In this context it does not necessarily mean a minister has sentenced somebody to imprisonment for life.

It means detention has no fixed statutory end date and release depends on an uncertain future event — such as successful documentation, a diplomatic agreement or an eventual deportation.

A person may ultimately be removed after six months, eighteen months or three years. The detention was still indefinite during the period when neither the detainee nor the state could identify a reliable endpoint.

That is the practical consequence the phrase "detained until they are deported" creates for unremovable cases.

18. What Would Reform Need to Legislate?

Policy objective	Legislative issue requiring clarity
Remove Hardial Singh constraints	How expressly are common-law limits displaced, and what replacement reasonableness test exists?
Detain until deported	What happens where deportation is not realistically achievable?
No more bail	Are Schedule 10 tribunal and Secretary of State bail powers repealed, restricted or retained?
Leave ECHR / repeal HRA	What domestic detention safeguards replace Article 5 scrutiny?

Policy objective	Legislative issue requiring clarity
Disapply treaty protections	How are non-removable and protection-risk cases treated while treaty status remains contested?
Detain vulnerable people	Which statutory medical/safeguarding release mechanisms remain?
Five-year emergency sunset	What happens on expiry to people still detained under unresolved cases?
Judicial supervision	What jurisdiction remains for judicial review, habeas corpus and damages for unlawful detention?

19. The Five-Year Sunset Creates an Unexpected Problem

Reform says key emergency provisions in the Mass Deportation Bill would contain a five-year sunset clause.

That raises a question almost absent from the public presentation: what is the legal status of a person still detained under those powers when the emergency provisions expire?

If the person remains unremovable, Parliament must either extend the regime, transition them into another detention power or release them.

The sunset therefore does not eliminate the unremovable-person problem. It postpones the point at which the legislature must confront it.

20. The Fiscal Consequence

Every additional month of detention carries operating, healthcare, legal, escort and estate costs.

Section 5.6 showed that a 24,000-place system could already require operating expenditure measured in billions over a Parliament under plausible benchmarks.

Long-stay unremovable cases increase the cost per completed deportation because expenditure continues while the removal denominator does not.

Any fiscal model that assumes “detain until deported” must therefore include a long-stay cohort and not price every bed as though it turns over on schedule.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying Hardial Singh gives every detainee automatic bail after a fixed number of days; that Britain currently has a statutory 28-day detention cap; that Reform could not lawfully ask Parliament to change common-law detention constraints; that everyone detained under Reform would remain in custody forever; or that every country currently blocking returns would necessarily continue doing so. Nor does the evidence support describing “detain until deported” as merely an administrative tightening. For people whom the state cannot deport, it removes the very condition that currently links detention to a realistically achievable exit.

Policy Feasibility: From Political Promise To Practical Delivery

5.9 Treaty Override by Emergency: Can Reform Simply Disapply Refugee, Torture and Trafficking Law?

EVIDENCE SUMMARY

Purpose: Test Reform UK's claim that a Mass Deportation Bill could temporarily disapply international protection obligations during a five-year migration emergency by relying on a "state of necessity".

Finding: The proposal appears to conflate three different bodies of law. First, Parliament can change the domestic legal effect of treaty-related rules because the United Kingdom is a dualist state. Second, doing so does not itself terminate the United Kingdom's international obligations: Article 27 of the Vienna Convention on the Law of Treaties says a state may not invoke its internal law to justify failure to perform a treaty. Third, "necessity" is not a general Vienna Convention switch allowing a government to suspend inconvenient treaties. The modern doctrine relied upon in international law is principally reflected in Article 25 of the International Law Commission's Articles on State Responsibility. It is an exceptional defence to the wrongfulness of particular non-performance, subject to cumulative conditions including grave and imminent peril and the requirement that the act be the only way to safeguard an essential interest.

The International Court of Justice has stressed that necessity is exceptional, its conditions are strict and cumulative, and the invoking state is not the sole judge of whether they are satisfied. It therefore cannot safely be treated as a pre-authorised five-year legislative waiver of the Refugee Convention, Convention Against Torture or anti-trafficking obligations.

Executive Brief

Reform's legal theory needs to be separated into domestic law and international law. A Westminster majority can legislate domestically in ways that conflict with treaty obligations, subject to other constitutional constraints. That may change what UK courts can enforce. It does not make the treaty obligation disappear internationally.

The Vienna Convention starts from the opposite proposition to a unilateral domestic "disapplication" theory. Article 26 requires treaties in force to be performed in good faith; Article 27 provides that internal law cannot be invoked as justification for failure to perform them.

The Vienna Convention also regulates how treaties are terminated, withdrawn from or suspended. Article 42 says those steps may occur only under the treaty itself or the Convention. Article 54 recognises withdrawal in conformity with a treaty's own provisions; Article 62 provides a narrow doctrine of fundamental change of circumstances. Neither is a generic emergency power allowing Parliament to switch treaty obligations off for five years.

The separate international-law doctrine of "necessity" belongs to the law of state responsibility. Article 25 of the ILC Articles describes it negatively: necessity may not be invoked unless stringent requirements are met. The conduct must be the only way to safeguard an essential interest against a grave and imminent peril; it must not seriously impair essential interests of the states or

international community concerned; the obligation must not exclude necessity; and the invoking state must not have contributed to the situation.

The ICJ in Gabčíkovo-Nagymaros held that necessity can only be accepted exceptionally, that the conditions are cumulative, and that the state invoking it is not the sole judge. The "only way" requirement is especially difficult for a mass-removal policy because lawful alternatives — case processing, returns agreements, enforcement, safe-third-country arrangements and other migration controls — plainly exist even if Reform regards them as slower or less effective.

The treaties Reform targets also contain their own exit mechanisms. The Refugee Convention can be denounced, but Article 44 provides a one-year notice period. The Convention Against Torture can likewise be denounced with one year's notice. The Council of Europe anti-trafficking convention can be denounced, with effect after approximately three months under Article 46.

Those withdrawal clauses undermine the idea that an emergency declaration can simply substitute for the treaty procedures. If Reform wants the UK no longer to be bound, international law already supplies formal routes. The political difficulty is that those routes take time and have consequences.

There is a further obstacle around torture. The prohibition of torture is widely treated as a peremptory norm of international law, and Article 26 of the ILC Articles says circumstances precluding wrongfulness cannot excuse conduct inconsistent with a peremptory norm. The precise customary-law status and scope of non-refoulement beyond the CAT treaty should be stated cautiously, but leaving or disapplying CAT would not create a general licence to expose people to torture.

The practical result is that Reform may be able to make UK legislation say "ignore these treaty-derived protections for domestic purposes", but that is legally different from saying "the United Kingdom is no longer internationally bound". The former can create an intentional treaty breach; it does not automatically produce the latter.

1. The First Error: "Disapply" Has Two Different Meanings

In domestic politics, "disapply" can mean instructing British decision-makers and courts not to apply a rule in a specified statutory context.

Internationally, however, a treaty remains binding until it is lawfully terminated, denounced, withdrawn from, suspended or otherwise affected under the applicable rules of international law.

Because the UK is a dualist state, these two legal planes can diverge. Parliament can enact legislation inconsistent with a treaty without thereby rewriting the treaty.

That produces a constitutionally possible but internationally awkward outcome: the domestic statute may be valid while the United Kingdom simultaneously incurs international responsibility for acting contrary to an obligation it still owes.

DOMESTIC POWER ≠ INTERNATIONAL RELEASE

Parliamentary sovereignty answers the question "what rule will a UK court apply?" It does not by itself answer the different question "what obligation does the United Kingdom owe other states and international bodies?"

2. The Vienna Convention Says Treaties Must Be Performed

The Vienna Convention on the Law of Treaties is the natural starting point because Reform invokes treaty law as part of its justification.

Article 26 codifies pacta sunt servanda: every treaty in force is binding and must be performed in good faith.

Article 27 then addresses the precise domestic-law argument: a party may not invoke its internal law as justification for failure to perform a treaty.

Accordingly, an Act of Parliament expressly directing ministers to disregard a treaty obligation may determine the domestic legal instruction, but Article 27 prevents that Act from functioning as an international-law excuse.

3. The Second Error: Necessity Is Not a Vienna Convention Emergency Button

The most important technical point is that the modern "state of necessity" doctrine Reform appears to rely upon is not a general suspension clause in the Vienna Convention on the Law of Treaties.

Necessity is principally articulated in Article 25 of the International Law Commission's Articles on Responsibility of States for Internationally Wrongful Acts and recognised in customary international law.

It concerns whether the wrongfulness of particular state conduct contrary to an international obligation may exceptionally be precluded. It does not automatically terminate the obligation, rewrite the treaty or create a five-year legislative opt-out.

The distinction is fundamental: a defence to responsibility for exceptional non-performance is not the same legal instrument as withdrawal from or suspension of a treaty.

Legal mechanism	What it does	What it does not automatically do
Domestic statutory disapplication	Changes how UK law operates in specified cases	Release UK from international treaty obligations
Treaty denunciation/withdrawal	Ends treaty obligations prospectively when valid and effective	Erase obligations or acts arising before effective withdrawal
Treaty suspension	Temporarily suspends performance where international law permits	Arise merely because domestic legislation says so

Legal mechanism	What it does	What it does not automatically do
Fundamental change — VCLT Art. 62	Potentially permits termination/withdrawal/suspension under strict conditions	Create a broad policy emergency exception
Necessity — State Responsibility Art. 25	May exceptionally preclude wrongfulness of particular non-performance	Terminate the treaty or permanently remove the obligation

4. Article 25 Sets an Exceptionally High Bar

Article 25 is deliberately drafted as a prohibition with narrow exceptions: necessity "may not be invoked" unless the conditions are met.

The state must identify an essential interest facing a grave and imminent peril.

The conduct inconsistent with the obligation must be the only way to safeguard that interest.

The conduct must not seriously impair an essential interest of the state or states toward which the obligation exists, or of the international community as a whole.

Necessity is unavailable where the obligation excludes reliance upon it or where the invoking state contributed to the situation.

These requirements are cumulative rather than a menu from which a government can choose.

5. The ICJ: The State Is Not the Sole Judge

The International Court of Justice's Gabčíkovo-Nagymaros judgment is the central authority.

The Court accepted that necessity exists in customary international law, but emphasised its exceptional character. It said the conditions are strictly defined, must be cumulatively satisfied and are not determined unilaterally by the state invoking the defence.

That is a major problem for any policy framed as: Parliament declares a migration emergency, therefore necessity exists for five years.

An emergency label in domestic legislation may be evidence of the Government's assessment. It is not conclusive under international law.

THE DECLARATION PROBLEM

A Westminster Act can declare that the Government considers a migration emergency to exist. It cannot make the international-law conditions of necessity true merely by saying so. The ICJ has expressly rejected the idea that the invoking state is the sole judge.

6. “Only Way” May Be the Hardest Test of All

The ILC commentary makes the “only way” requirement demanding. Necessity is excluded where other lawful means are available, even where those alternatives are more costly or less convenient.

For migration policy, the existence of alternative measures is obvious: faster asylum decisions, expanded enforcement, negotiated returns agreements, voluntary-return programmes, detention within existing legal limits, safe-third-country agreements, bilateral cooperation and ordinary treaty withdrawal procedures.

Reform may argue that those measures are inadequate to achieve its desired speed or scale. But “less effective for our political target” is not the same proposition as “no other lawful way exists to safeguard the essential interest”.

That makes a blanket five-year necessity claim substantially harder to defend than a genuinely exceptional act responding to a specific imminent peril.

7. Necessity Is Temporary by Nature

The doctrine is concerned with exceptional non-performance for so long as the necessity exists.

Article 27 of the ILC Articles provides that invoking a circumstance precluding wrongfulness is without prejudice to compliance with the obligation if and to the extent that the circumstance ceases to exist.

That sits uneasily with legislation that prospectively declares a fixed five-year period regardless of how migration numbers, operational capacity or the alleged peril change during that time.

A genuine necessity assessment would need continuing evidence that the conditions remain satisfied, not simply a sunset date chosen in advance.

8. Refugee Convention: There Is Already a Withdrawal Route

The 1951 Refugee Convention expressly provides for denunciation.

Article 44 permits a contracting state to denounce the Convention by notification to the UN Secretary-General, with denunciation taking effect one year after receipt.

That route matters because it demonstrates the difference between lawful exit and unilateral non-performance.

If Reform believes the Convention is fundamentally incompatible with its programme, the legally straightforward international route is to denounce it and wait for the notice period to expire. A domestic “disapplication” during that year would not make the continuing international obligation disappear.

9. The Refugee Convention Is Not an Absolute Bar to Every Removal

It is also important not to overstate the Convention.

The Refugee Convention does not create a universal rule that every person arriving irregularly must remain permanently in the UK. It contains a specific non-refoulement obligation and other protections, while permitting removal in circumstances consistent with those obligations.

Article 33 itself contains a security-related exception for certain refugees, although other legal protections — particularly against torture or inhuman treatment — may still independently prohibit return.

The evidential criticism of Reform should therefore remain precise: the Convention constrains where and how some people can be removed; it does not prohibit immigration control as such.

10. Convention Against Torture: The Hardest Protection to "Disapply"

Article 3 of the Convention Against Torture provides that a state party shall not expel, return or extradite a person where substantial grounds exist for believing they would be in danger of torture.

The Committee Against Torture's General Comment No. 4 confirms that "deportation" for Article 3 purposes includes expulsion, forcible return, rejection at the frontier and pushback operations at sea.

The Convention also states in Article 2 that no exceptional circumstances whatsoever — including war, political instability or any other public emergency — may justify torture itself.

Article 31 allows denunciation, but it takes effect one year after notification and does not erase responsibility for acts or omissions occurring before the effective date.

Consequently, a Reform government could formally start withdrawal. It could not plausibly treat the notice period as though the treaty had already ceased to bind the UK.

11. Torture Also Raises Jus Cogens

There is an additional layer beyond the treaty text.

The prohibition of torture is generally recognised as a peremptory norm — jus cogens — from which derogation is not permitted.

Article 26 of the ILC Articles on State Responsibility states that circumstances precluding wrongfulness do not excuse an act inconsistent with an obligation arising under a peremptory norm of general international law.

The precise extent to which every aspect of non-refoulement is independently peremptory or customary is more contested and should not be overstated. But it would be legally unsafe to assume that denunciating CAT or invoking necessity creates a free-standing power knowingly to expose a person to torture.

THE TORTURE FLOOR

Whatever happens to the ECHR, Refugee Convention or CAT membership, a government cannot safely assume that the international prohibition connected with torture disappears with a treaty notice. Peremptory and customary international-law rules may continue independently of treaty membership.

12. ECAT: Trafficking Protection Has Its Own Exit Clause Too

The Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) creates identification and protection obligations relevant to removal.

Article 10 requires that where authorities have reasonable grounds to believe a person is a trafficking victim, that person is not removed until the identification process has been completed.

ECAT is unusually clear about reservations: Article 45 permits no reservation to its provisions except a narrow reservation concerning Article 31(2).

But ECAT can be denounced. Article 46 permits notification to the Council of Europe Secretary General, with denunciation taking effect on the first day of the month following three months after receipt.

Again, this is a formal legal exit mechanism. A domestic emergency declaration is not the same thing as using it.

13. ECAT Also Preserves Other International Protections

ECAT itself anticipates overlap with other international law.

Article 40 states that nothing in the Convention affects rights, obligations and responsibilities under international law, specifically referring to international human-rights law, the Refugee Convention and the principle of non-refoulement.

Leaving ECAT therefore would not by itself erase Refugee Convention, CAT, ECHR or customary-law constraints.

The protection system is layered. Removing one layer may change procedure and remedies while leaving another legal prohibition intact.

14. The Treaty Exit Timetable

Instrument	Relevant exit route	When exit becomes effective	Immediate “day one” release?
1951 Refugee Convention	Article 44 denunciation to UN Secretary-General	One year after receipt	No
Convention Against Torture	Article 31 denunciation to UN Secretary-General	One year after receipt	No
ECAT	Article 46 denunciation to Council of Europe Secretary General	First day of month after three-month period	No
ECHR	Separate Article 58 process	Six months after notice	No

Instrument	Relevant exit route	When exit becomes effective	Immediate “day one” release?
Domestic implementing legislation	Act of Parliament	According to statute	Can alter domestic law, but not itself terminate treaty

15. Fundamental Change of Circumstances Is a Different Doctrine

The Vienna Convention does contain a doctrine sometimes associated with radically changed conditions: Article 62, fundamental change of circumstances.

But Article 62 is itself narrow. The change must have been unforeseen; the original circumstances must have constituted an essential basis of consent; and the change must radically transform the extent of obligations still to be performed.

The provision begins from a presumption against invocation, not an open-ended emergency power.

Even where Article 62 is available, the Vienna Convention provides procedures for notification and objections. It is not equivalent to Parliament announcing that selected treaty obligations are suspended because migration is politically urgent.

16. Treaty Suspension Has Procedures

The Vienna Convention’s architecture matters because it rejects self-help as the ordinary model.

Article 42 says termination, withdrawal and suspension occur only under the treaty or the Vienna Convention.

Article 65 requires a state invoking a Convention ground for termination, withdrawal or suspension to notify the other parties, identify the proposed measure and give reasons. Where another party objects, the parties are to seek a peaceful solution.

This does not mean international law possesses a police officer capable of physically stopping Westminster from legislating. It means the legal status of the action is determined by international rules, not merely by the domestic statute.

17. Could Parliament Deliberately Authorise Treaty Breach?

As a matter of UK constitutional structure, Parliament can enact legislation that is inconsistent with an unincorporated treaty or expressly overrides domestic provisions implementing treaty obligations.

UK courts generally distinguish domestic law from international treaty obligations because the UK is dualist.

If the statutory language is clear, a domestic court may therefore be required to apply the Act even though the executive action places the UK in breach internationally.

That is not a legal magic trick. It is an intentional allocation of consequences: domestic authority on one side, international responsibility on the other.

The report should therefore avoid saying “Parliament cannot do this”. A more accurate conclusion is: Parliament may be able to authorise the domestic conduct, but Parliament cannot by domestic legislation make the international obligation cease to exist.

THE STRONGEST FORMULATION

The weakness in Reform’s theory is not that Westminster lacks power to legislate. It is that domestic legislative power is being presented as though it also supplies an international-law defence. Those are different questions.

18. International Responsibility Does Not Require a Strasbourg Court

Reform’s programme often treats withdrawal from the ECHR as though it removes the international-law problem generally.

The Refugee Convention and CAT are United Nations treaties. ECAT is a separate Council of Europe treaty. The Vienna Convention and customary rules of state responsibility operate on another plane again.

Leaving the ECHR would remove the Strasbourg Court’s jurisdiction over future UK conduct after withdrawal takes effect, subject to the Convention’s rules on prior acts. It would not terminate unrelated treaty obligations.

International consequences can include findings by treaty-monitoring bodies, interstate disputes where jurisdiction exists, diplomatic consequences, reputational costs and effects on cooperation with states whose assistance Reform needs for returns.

19. The Foreign-Policy Contradiction

Sections 5.4 and 5.5 established that mass returns depend heavily on cooperation from other countries.

That creates a strategic tension. Reform proposes to tell international partners that Britain can temporarily set aside multilateral obligations when it judges them inconvenient, while simultaneously asking those partners to enter new readmission agreements and trust Britain to perform them.

This does not make new agreements impossible. States negotiate with governments whose legal positions they dislike all the time.

But treaty credibility has instrumental value. A returns strategy dependent on bilateral promises has reason to care whether counterparties believe British treaty commitments will remain binding when domestic political pressure rises.

20. The Five-Year Emergency Is Legally Awkward

Reform’s five-year emergency period appears designed around a parliamentary term and its 600,000-removal target.

International necessity doctrine is not organised around election cycles.

If the alleged grave and imminent peril ceased after eighteen months, the basis for necessity would need to be reassessed. If the conditions were never satisfied for a particular obligation or particular act, the existence of a five-year statute would not cure that problem internationally.

Conversely, if Reform genuinely believed the treaties themselves were structurally incompatible with UK interests, formal denunciation would be the more coherent legal route than a temporary five-year refusal to perform them.

21. A Treaty-by-Treaty Deliverability Matrix

Claimed obstacle	Can Parliament change domestic effect?	Can UK formally withdraw?	Can "necessity" automatically switch it off?	Key complication
Refugee Convention	Potentially, through legislation	Yes — one-year notice	No	Non-refoulement and overlapping protections
CAT	Potentially, through legislation	Yes — one-year notice	No	Torture prohibition / possible independent customary and peremptory rules
ECAT	Potentially, through legislation	Yes — roughly three-month process	No	Victim-identification/ removal protections; other treaties remain
ECHR/HRA	HRA can be repealed; domestic effect altered	ECHR denunciation under Art. 58	No	Six-month notice; prior acts remain within Convention regime
Customary/jus cogens rules	Domestic legislation can direct UK authorities	No treaty to denounce	Necessity restricted; no excuse for jus cogens breach	Obligation may exist independently of treaty membership

22. What Reform Could Lawfully Do More Cleanly

- Give formal notice of withdrawal from treaties it genuinely intends to leave and respect the notice periods.

- Legislate domestically for the post-withdrawal framework before the withdrawal becomes effective.
- Use treaty-compliant exceptions and accelerated procedures during the notice period.
- Negotiate readmission and safe-third-country agreements that reduce the number of cases engaging non-refoulement protections.
- Prioritise removable cases while legally complex protection cases are resolved.
- Publish the legal opinion supporting any necessity claim, including analysis of each cumulative Article 25 condition.
- Define what happens if an international body or court rejects the necessity argument.
- Identify which protections Reform believes survive as customary or peremptory international law after treaty withdrawal.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying Parliament is legally incapable of passing a statute inconsistent with a treaty; that every treaty rule automatically has direct effect in UK courts; that the Refugee Convention prohibits every deportation; that every non-refoulement obligation is unquestionably jus cogens; or that treaty breach automatically invalidates a UK Act of Parliament. Nor does it support Reform's apparent shortcut: a domestic declaration of "state of necessity" does not automatically suspend international treaty obligations for five years, and the doctrine of necessity is not a general Vienna Convention power to do so.

Policy Feasibility: From Political Promise To Practical Delivery

5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

EVIDENCE SUMMARY

Purpose: Stress-test Reform UK's mass-removal programme after granting the party, for analytical purposes, the legal changes it says it wants: repeal of the Human Rights Act, withdrawal from the ECHR, withdrawal or domestic disapplication of major protection treaties, restrictions on claims and appeals, and removal of Hardial Singh constraints.

Finding: The protection system is layered rather than controlled by one treaty or one court. Removing the Human Rights Act would remove an important domestic enforcement mechanism; leaving the ECHR would remove Strasbourg jurisdiction over future conduct after withdrawal takes effect; denouncing the Refugee Convention, CAT and ECAT would remove important treaty obligations after their notice periods. But none of those steps logically proves that every proposed removal becomes lawful. Residual constraints can arise from customary international law, peremptory norms, the statutory wording Parliament actually enacts, ordinary public-law requirements, procedural fairness, rationality, factual country-risk evidence and any other treaty obligations Reform leaves in force.

The strongest surviving floor concerns torture. The International Court of Justice has held that the prohibition of torture is part of customary international law and has become a peremptory norm (jus cogens). The precise extent to which non-refoulement itself is independently jus cogens is more contested, so this report does not overstate it. But treaty withdrawal cannot sensibly be analysed as creating a blank legal space in which knowingly exposing a person to torture is automatically permissible.

Executive Brief

Section 5.9 established that domestic statutory disapplication and international treaty withdrawal are different legal acts. Section 5.10 asks the next question: after Reform completes both as far as possible, what remains?

The answer is not “nothing”. The Commons Library’s June 2026 review of ECHR withdrawal expressly notes that many Convention obligations are also found in UN treaties or customary international law, meaning the UK could remain bound by some obligations after leaving the ECHR.

The Supreme Court’s Rwanda judgment demonstrates why destination consent is not the same thing as legal removability. Rwanda had agreed to accept asylum seekers. The decisive question was nevertheless whether there were substantial grounds for believing that people transferred there faced a real risk of onward refoulement.

That distinction survives conceptually under any legal regime: “country X will take this person” answers a diplomatic/logistical question; “the UK may lawfully send this person there” answers a legal and factual risk question.

The most robust international-law floor is the prohibition of torture itself. In Belgium v Senegal the International Court of Justice held that the prohibition of torture is customary international law and a peremptory norm. A state cannot contract out of a jus cogens prohibition merely by leaving a treaty.

The harder question is whether the duty not to transfer a person into a real risk of torture survives in exactly the same form after withdrawal from CAT and the ECHR. Authorities and commentators support important customary non-refoulement obligations, but the precise scope and peremptory status are legally debated. A responsible report should therefore distinguish the uncontested torture prohibition from the more contested outer boundary of customary non-refoulement.

Domestic judicial review is another layer. Current HMCTS guidance confirms that immigration and asylum decisions can be challenged by judicial review for unlawfulness, illegality, irrationality or unreasonableness. Repealing the Human Rights Act does not, by itself, abolish judicial review.

Parliament can legislate to restrict claims, alter substantive duties and attempt to limit review. But the exact words matter. Unless Reform legislates with sufficient clarity to remove a particular legal duty or remedy, ordinary public law remains capable of testing whether ministers acted within statutory power, considered mandatory matters, followed required procedure and reached decisions rationally.

Country evidence remains unavoidable even under a tougher legal code. The Home Office maintains Country Policy and Information Notes precisely because removal and protection decisions depend on current facts about security, state protection, documentation, internal relocation and treatment of particular groups. Rewriting the law does not rewrite conditions in Afghanistan, Syria, Iran or any other destination.

The practical consequence is a residual “protection floor” made from several materials rather than one shield. Reform can lower that floor substantially. It cannot credibly assume that removing the ECHR and selected treaties converts every administratively convenient destination into a lawful one.

1. The Legal Protections Are Layered

Public debate often treats the ECHR as though it is the single legal object standing between the Home Secretary and deportation.

In reality, removal decisions sit inside overlapping domestic and international systems: Acts of Parliament, Immigration Rules, common-law public law, the ECHR/HRA, the Refugee Convention, CAT, trafficking law, other human-rights treaties, customary international law and destination-specific factual evidence.

Some layers overlap. Some protect different interests. Some are directly enforceable domestically and some primarily generate international responsibility.

Removing one layer can therefore make removal easier without answering every remaining question.

Layer	What Reform proposes	What may remain
Human Rights Act 1998	Repeal	Ordinary statutory interpretation/public law; other domestic statutes
ECHR	Withdraw	Other treaties; customary international law; domestic law not dependent on ECHR
Refugee Convention	Disapply/withdraw	CAT/other treaties while applicable; possible customary rules; domestic law retained by Parliament
Convention Against Torture	Disapply/withdraw	Peremptory/customary prohibition of torture; disputed/customary non-refoulement questions
ECAT	Disapply/withdraw	Other trafficking statutes/treaties unless separately changed; public law
Hardial Singh	Override	Whatever detention limits Parliament retains; habeas corpus/judicial review unless validly curtailed

Layer	What Reform proposes	What may remain
Appeals / claims	Restrict	Judicial review and statutory exceptions unless expressly removed
Country risk	Cannot legislate facts away	Evidence about actual treatment, documentation and onward removal risk

2. ECHR Withdrawal Does Not Empty the Legal Landscape

The House of Commons Library's June 2026 briefing makes this point expressly: many ECHR obligations also appear in UN human-rights treaties or customary international law, so the UK could remain bound by them after withdrawal.

Leaving the Convention would still be a major legal change. It would remove the UK from Strasbourg supervision for future conduct after withdrawal becomes effective and would remove the ECHR treaty obligation prospectively, subject to the Convention's withdrawal rules.

But it does not repeal unrelated statutes automatically, denounce unrelated treaties automatically or abolish customary international law.

Any Reform bill therefore needs a legal inventory rather than the slogan "leave the ECHR".

3. The Rwanda Judgment Shows the Difference Between Acceptance and Safety

The 2023 Supreme Court Rwanda judgment remains analytically important even if Reform later removes some of the legal instruments applied in that litigation.

Rwanda had agreed to accept asylum seekers under the Migration and Economic Development Partnership. The diplomatic receiving arrangement therefore existed.

The courts nevertheless examined whether deficiencies in Rwanda's asylum system created a real risk of refoulement — onward transfer to countries where people could face persecution or inhuman treatment.

The Supreme Court case thus demonstrates a general proposition: destination consent is necessary for many removals, but consent does not establish destination safety.

Under a future Reform regime, the precise legal source of the safety test might change. The factual problem would not.

TWO DIFFERENT QUESTIONS

1. Will another country accept the person?
2. Is Britain legally entitled to send the person there?

Sections 5.3–5.4 concentrated on question 1. Sections 5.9–5.10 show why a successful returns agreement does not automatically answer question 2.

4. Torture Is the Hardest Floor

The clearest residual rule is the prohibition of torture itself.

In Questions relating to the Obligation to Prosecute or Extradite (Belgium v Senegal), the International Court of Justice stated that the prohibition of torture forms part of customary international law and has become a peremptory norm — jus cogens.

Peremptory norms occupy a special status in international law. Treaty withdrawal does not authorise a state to commit torture simply because the treaty text is no longer binding upon it.

The ILC's state-responsibility framework similarly provides that circumstances which might otherwise preclude wrongfulness do not excuse conduct inconsistent with a peremptory norm.

This matters because Reform's proposed legal reset cannot safely be modelled as "CAT gone = torture constraint gone".

5. Non-Refoulement Requires More Careful Language

The next proposition must be framed more cautiously.

Non-refoulement is the rule against transferring a person into specified forms of serious danger. It appears in different legal instruments with different scopes: refugee persecution under the Refugee Convention; torture under CAT; and torture or inhuman/degrading treatment under Article 3 ECHR.

There is substantial authority for non-refoulement obligations in customary international law, particularly in refugee and torture contexts. But the exact content, universality and jus cogens status of all forms of non-refoulement are not as uncontested as the jus cogens prohibition of torture itself.

The report should therefore resist the tempting but legally overbroad claim that "non-refoulement can never be changed because it is all jus cogens".

The safer conclusion is that treaty withdrawal may remove important treaty-based causes of action while leaving significant customary-law questions that a government would need to address rather than assume away.

PRECISION RULE

Prohibition of torture = strongly established customary international law and jus cogens.

Every possible formulation of non-refoulement = do not automatically label jus cogens. Analyse the source, risk and destination separately.

6. Parliament Can Change Domestic Law — But It Must Actually Do So

Section 5.9 deliberately avoided the false claim that Parliament is incapable of legislating contrary to international law.

The same discipline is necessary here.

If Parliament clearly repeals a statutory protection, courts cannot simply recreate the repealed rule because they prefer it. Parliamentary sovereignty remains central to the UK constitution.

But legal consequences follow from the statute Reform actually enacts, not from a manifesto description of what ministers hoped it would achieve.

If existing duties, definitions, tribunal powers, procedural requirements or safeguards remain on the statute book, decision-makers remain bound by them.

The legislative exercise required to construct Reform's desired protection floor is therefore much larger than repealing the Human Rights Act alone.

7. Judicial Review Is Not an ECHR Invention

Judicial review is a domestic public-law mechanism for supervising the legality of executive action.

Current HM Courts and Tribunals Service guidance states that immigration and asylum conduct can be challenged where a public body has acted unlawfully, illegally, irrationally or unreasonably according to the legal criteria.

The Human Rights Act supplies important additional grounds and remedies, but judicial review predates it and does not disappear automatically upon HRA repeal.

A Reform Home Secretary could therefore still face challenges alleging that an official used the wrong statutory power, failed to follow mandatory procedure, relied on legally irrelevant considerations, ignored required evidence, misunderstood the statute or acted irrationally.

Parliament can attempt to narrow judicial review or create ouster provisions. Whether such provisions succeed, and how courts interpret them, depends on their precise drafting and wider constitutional principles.

8. Emergency Removal Still Creates an Interim-Relief Problem

Removal is unusually sensitive to timing because once an individual has been transferred to another country, later success in litigation may be difficult to make effective.

Current HMCTS guidance therefore provides for urgent judicial-review consideration where a person is due to be removed imminently.

Current Home Office guidance likewise contains procedures for judicial reviews, injunctions and deferral of removal.

Reform can legislate to restrict suspensive claims or interim remedies, but it then assumes a different risk: an unlawful removal may occur before a court has had a realistic opportunity to examine it.

That shifts the policy problem from delayed removals to potentially irreversible errors.

9. The Existing Illegal Migration Act Already Illustrates the Trade-Off

The Illegal Migration Act 2023 created a model of tightly limited suspensive claims rather than ordinary broad suspension of removal.

Its explanatory material describes a serious-harm suspensive claim where removal would create a real, imminent and foreseeable risk of serious and irreversible harm before the underlying human-rights claim or judicial review can be resolved.

Whatever Reform thinks of that threshold, its existence demonstrates the design problem Parliament must solve: if most challenges do not suspend removal, some emergency mechanism is needed for cases in which sending the person away first could cause irreversible harm.

A Reform bill promising even fewer suspensive routes must state what, if anything, replaces that safety valve.

10. Country Evidence Does Not Disappear When Rights Are Narrowed

The Home Office's Country Policy and Information Team produces country material for asylum and human-rights decision-makers.

Its June 2026 methodology explains that CPINs provide country information used in decisions about protection claims.

Current country collections continue to be updated for states including Afghanistan, Syria, Iraq, Nigeria, Colombia and others.

This infrastructure exists because destination conditions change: governments fall, conflicts intensify, documentation systems collapse, minorities become safer or less safe, and internal relocation may become possible or impossible.

A statute can change the legal threshold applied to those facts. It cannot make the underlying facts cease to matter.

11. Reform Would Still Need a Country-Risk Function

Even the hardest possible removal regime needs intelligence about destinations.

The more aggressively claims and appeals are compressed, the more responsibility moves onto the quality of the Home Office's initial country intelligence and first-instance decision.

12. Safe Third Countries Need More Than a Signature

A bilateral agreement can establish that a third country has promised to receive people and treat them in a specified way.

The Rwanda litigation showed why courts may also examine how a system operates in practice rather than relying exclusively on assurances.

If Reform removes the domestic legal routes that enabled that particular litigation, the political and operational risk remains: a partner state can fail to implement what it promised.

For a mass programme, Britain would need monitoring, audit, return-of-person mechanisms, escalation procedures and evidence that onward refoulement is not occurring.

Otherwise a nominally "safe" destination can become an uncontrolled transfer point.

13. Diplomatic Assurances Are Evidence, Not Magic Words

Governments sometimes rely on diplomatic assurances to manage removal risk.

Such assurances can be relevant and, depending on the legal framework and facts, may be sufficient.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

A Reform system operating at very high volume would need to determine whether assurances are individual, cohort-based or country-wide and who verifies compliance after removal.

Mass throughput can therefore conflict with the case-specific scrutiny needed where risk is highly individual.

14. Criminality Does Not Automatically Remove the Torture Problem

Some protection regimes contain exclusions or exceptions for serious criminals or people who pose security risks.

The Refugee Convention, for example, is not an absolute bar to removal of every refugee in every circumstance.

But the prohibition of torture is structurally different. A person's criminality does not transform torture into lawful treatment.

That is why foreign-national-offender cases can be among the most politically difficult: the public interest in removal may be extremely strong while the destination risk remains legally serious.

Reform's programme needs a rule for those cases rather than assuming that undesirability answers the risk question.

15. "We Know They Are Dangerous" Is Not the Same as "We Can Remove Them"

This distinction links directly back to Section 5.8.

A government may have compelling reasons not to want an individual at liberty in Britain and still lack a lawful or practical removal destination.

Weakening asylum status, family-life claims or ordinary appeals does not necessarily solve torture risk, destination refusal or absence of documentation.

If release is also restricted, the same person moves back into the long-stay detention problem.

The legal reset therefore cannot be analysed independently of detention capacity.

16. Error Correction Becomes More Important as Appeals Shrink

Section 5.7 showed that Reform proposes mass data fusion to identify people for enforcement.

If the same programme also narrows claims and appeals, first-instance errors become more consequential.

A mistaken identity, outdated immigration record or wrong country-risk assessment can move more quickly from database to detention to aircraft.

Reducing procedural layers may increase speed, but a credible system must show that its accuracy controls improve enough to compensate.

The policy should therefore publish error, withdrawal, conceded-case and post-decision correction rates rather than measuring success only by removals.

SPEED–ERROR TRADE-OFF

Every safeguard removed from the back end of the process increases the importance of accuracy at the front end. A system designed to make challenges harder cannot simultaneously treat first-instance error as a marginal issue.

17. The Residual Domestic Questions

Question	Why it survives unless Reform legislates otherwise
Was the correct statutory power used?	Executive action requires legal authority
Did the decision-maker follow mandatory procedure?	Statutory procedural duties remain binding
Was the correct person identified?	Mistaken identity is not cured by tougher immigration policy
Was material evidence ignored?	May engage rationality/fairness/statutory duties
Was the destination the one authorised by statute?	Removal powers have legal scope
Was a remaining protection threshold met?	Any retained exception must be applied
Was detention authorised?	Liberty requires statutory authority
Was an ouster clause applicable and effective?	Depends on precise legislative wording and judicial interpretation

18. The Residual International Questions

Question	Potential source after treaty withdrawals
Would UK conduct itself amount to torture?	Customary international law / jus cogens

Question	Potential source after treaty withdrawals
Would transfer knowingly expose a person to torture?	Residual customary-law/non-refoulement arguments; precise scope requires legal analysis
Does another UN treaty remain applicable?	Depends which treaties Reform leaves in force
Has treaty withdrawal actually taken effect?	Notice periods and treaty clauses
Does conduct pre-date effective withdrawal?	Withdrawal generally does not erase prior responsibility
Is a claimed emergency defence valid?	Customary state-responsibility rules; strict necessity conditions
Is another peremptory norm engaged?	Jus cogens cannot be displaced by ordinary treaty or domestic law

19. A Receiving State Can Be Cooperative and Still Be Unsafe for One Person

Country-level cooperation and individual-level risk are not identical.

A state may be perfectly willing to receive its nationals while a particular returnee faces danger because of political activity, religion, ethnicity, sexuality, family association, past conduct or other characteristics.

Conversely, a country with serious general human-rights problems may still be a lawful destination for some individuals depending on the governing legal threshold and evidence.

This is why individualised decision-making persists even in restrictive systems.

A 600,000-person programme creates pressure to replace individual assessment with categorical country rules. That may improve speed, but it magnifies the consequences when a category contains exceptional cases.

20. What Reform Can Actually Remove

- Article 8 family/private-life litigation can be narrowed dramatically by statute and ECHR withdrawal.
- Statutory appeal rights can be reduced.
- Domestic incorporation of Convention rights through the HRA can be repealed.
- Treaty memberships can be denounced using their exit clauses.
- Immigration Rules can be rewritten.
- Bail and detention rules can be altered, subject to whatever constitutional and statutory limits remain.
- Procedural thresholds for protection claims can be raised.

- The range of suspensive challenges can be reduced.

21. What Reform Cannot Simply Assume Away

- The factual conditions in the destination country.
- A foreign government's willingness and practical ability to accept the person.
- The identity and nationality of the person being removed.
- The peremptory international prohibition of torture.
- International obligations that remain in force because Reform has not withdrawn from them or the notice period has not expired.
- Any customary international-law rules applicable to the conduct.
- Any domestic statutory protections Parliament leaves intact.
- The need for legal authority for detention and executive action.
- The possibility of judicial review unless and to the extent Parliament validly restricts it.
- The operational consequences of wrongful removal, failed transfer or diplomatic breach.

22. The Protection-Floor Stress Test

Scenario after Reform legal changes	Likely remaining question
Destination refuses the person	Removal impossible as a practical matter
Destination accepts, but person alleges torture risk	Treaty/customary/peremptory and domestic residual-law analysis required
Destination accepts, but onward refoulement system is unreliable	Safety of third-country arrangement remains a factual/legal issue
Wrong person identified by data fusion	Statutory authority, factual error, fairness and review
Travel document obtained under wrong identity	Identity/legal authority; receiving-state consequences
Person is serious criminal but faces torture	Criminality strengthens removal interest but does not legalise torture
Treaty denunciation notice still running	Treaty remains in force until effective withdrawal
Removal happens before urgent challenge can be heard	Risk of irreversible unlawful act and later state responsibility

Scenario after Reform legal changes	Likely remaining question
Parliament expressly overrides a domestic protection	Domestic rule may change; international obligation may remain

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying that leaving the ECHR would make deportation lawless; that UK judges could simply ignore a clear Act of Parliament because they prefer international law; that every non-refoulement rule is indisputably jus cogens; that every dangerous country is legally unavailable for every returnee; or that judicial review can never be restricted by Parliament. It equally does not support the opposite claim that ECHR withdrawal plus treaty denunciation creates a legal vacuum. The remaining law depends on the precise statute, treaties still in force, customary and peremptory rules, and the facts of each proposed transfer.

Policy Feasibility: From Political Promise To Practical Delivery

5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?

EVIDENCE SUMMARY

Purpose: Test whether Reform UK's target of 600,000 removals over five years can be translated into a credible workforce plan. This section does not assume that present staffing ratios can simply be multiplied by twelve. It maps the functions that must exist, compares Reform's annual target with the current system, and identifies where recruitment, vetting, training, certification and professional scarcity create hard implementation constraints.

Finding: Reform's target of 120,000 removals a year is approximately 12.3 times the 9,723 enforced returns recorded in the year ending March 2026. Immigration Enforcement currently employs around 5,000 people across all of its missions, not merely removals. The current government has already treated staffing as a material constraint: 1,000 staff were reallocated to immigration enforcement from 2024, and in June 2026 the Home Office announced that the Immigration Enforcement workforce would be increased by 60% from its 2024 level during 2026–27.

The key point is not that Reform therefore needs exactly 12.3 times the present workforce. Returns are not produced by one homogeneous labour input and some functions can scale through technology, specialisation or charter operations. The point is that Reform has published a removal target and detention-estate target without a comparable workforce establishment: no published headcount by function, recruitment timetable, training pipeline, shift model, attrition allowance or plan for the linked capacity required in courts, healthcare, interpreting and escorting.

Executive Brief

Reform's annual removal target is 120,000. The latest Home Office statistics record 9,723 enforced returns in the year ending March 2026. The proposed annual throughput is therefore about 12.3 times the current enforced-return flow.

Immigration Enforcement is not a 120,000-removal machine waiting to be given more detention beds. Home Office careers material says around 5,000 people work across Immigration Enforcement, whose missions include compliance, intelligence, criminal investigation, enforcement visits, foreign-national-offender work and returns.

The current government has already demonstrated that returns are staffing-sensitive. It reallocated 1,000 staff to immigration enforcement from 2024; Home Office statistical commentary identifies that reallocation as one factor that may have contributed to rising enforced returns. In June 2026 the Government announced a further 60% workforce increase from the 2024 baseline during 2026–27.

Frontline enforcement staff are not instantly deployable. Home Office careers material describes five weeks of immigration training plus two weeks of Personal Safety Training for an Immigration Enforcement officer, while applicants to Border Force and Immigration Enforcement also undergo pre-employment screening, security vetting and an additional integrity check.

Detention staff have a separate certification pipeline. Home Office rules require Detainee Custody Officers and escort officers to complete mandatory role-specific training before certification; moving into another DCO role requires additional approved training.

The proposed 24,000-place estate would also require healthcare, welfare, engagement, interpretation, legal access, facilities management and management capacity. Existing IRC guidance says centres have dedicated healthcare facilities staffed by doctors and nurses and that staffing and ancillary services must rise when capacity rises.

Escorting is its own national logistics system. A 2025 Home Office procurement notice describes the escorting contract as fundamental to moving detainees around the UK and removing them overseas, predominantly by air, using both escorted and unescorted journeys. Scaling removals to 120,000 a year therefore means scaling vehicles, custody escorts, airport operations, flight planning and overseas escort capability as well as caseworkers.

Interpreting is not optional infrastructure. Current Home Office guidance maintains a dedicated Interpreter & Language Service Unit and specific interpretation rules in the detention estate. A mass programme covering many nationalities would generate large, irregular demand for vetted language capacity.

The justice system is already under pressure. In 2025/26 the First-tier Tribunal Immigration and Asylum Chamber received about 118,000 cases but disposed of about 57,000; the open caseload reached about 152,000. Reform proposes to reduce appeal routes, but unless it eliminates every review mechanism successfully, the scale and speed of new enforcement decisions can transfer workload into whatever legal routes remain.

The National Audit Office's December 2025 systems analysis is especially relevant: it identifies severe capacity constraints across judges, legal aid, caseworkers and accommodation and warns that increasing speed in one part of the asylum system has sometimes reduced decision quality or shifted problems elsewhere.

The workforce question is therefore not "can Britain recruit people?" It plainly can. The question is whether thousands of people across several specialised labour markets can be recruited, vetted, trained, certified, supervised and made productive quickly enough for Reform's five-year throughput assumptions — without simply stripping staff from other Home Office, policing, prison, NHS or justice functions.

1. Start With the Throughput Gap

Reform's target is 600,000 removals over five years: an average of 120,000 a year, 10,000 a month or about 329 every day of the year.

The Home Office recorded 9,723 enforced returns in the year ending March 2026 — about 810 a month or 27 a day.

On that comparison, Reform is proposing annual enforced-removal throughput approximately 12.3 times the latest recorded level.

This is a throughput comparison, not a staffing formula. Voluntary returns, foreign-national-offender processes, charter flights and different case mixes have different labour requirements. But it establishes the scale of organisational change that any workforce plan must explain.

Measure	Current / latest benchmark	Reform target	Scale difference
Enforced returns per year	9,723 (YE Mar 2026)	120,000	~12.3×
Average per month	~810	10,000	~12.3×
Average per day	~27	~329	~12.3×
Five-year equivalent at current annual rate	~48,615	600,000	~551,385 additional removals

2. Immigration Enforcement Is Only About 5,000 People Today

Home Office careers material says around 5,000 people work in Immigration Enforcement across the UK.

Those 5,000 are not all deportation officers. The organisation also targets organised immigration crime, conducts intelligence-led enforcement visits, investigates offences, manages compliance and works with partner agencies.

That means the relevant current removals workforce is smaller than the headline Immigration Enforcement headcount, but publicly available material does not provide a clean current establishment for every removal-stage function.

For that reason, this report does not multiply 5,000 by 12.3 and present the result as a forecast. Doing so would imply false precision.

DO NOT USE A FALSE 12.3× STAFFING FORMULA

A 12.3-fold increase in removals does not prove that Reform needs 12.3 times every current employee. Some tasks have fixed costs; some can be automated; charter flights can create economies of scale; and case complexity varies. The evidential finding is narrower: Reform is proposing a 12.3-fold throughput increase without publishing the workforce model that would show where those economies occur.

3. The Current Government Is Already Expanding the Same Workforce

The baseline is not static.

Home Office returns statistics state that 1,000 staff were reallocated to immigration enforcement from 2024 as part of the drive to increase returns.

In June 2026 the Home Office announced that the Immigration Enforcement budget would double by 2028–29 and that workforce numbers would increase by 60% from the 2024 level during 2026–27.

That announcement is useful for two reasons. First, it confirms that government itself treats workforce capacity as a central lever in increasing raids, arrests and deportations. Second, it means Reform would inherit an organisation already undergoing rapid expansion and would then require a much larger additional acceleration to reach 120,000 enforced removals a year.

Rapid growth also creates a training burden on experienced staff: new recruits need supervision, mentoring and quality assurance, so headcount can rise faster than productive capacity in the early stages.

4. What One Removal Actually Requires

A completed enforced removal is the end of a chain of human decisions and physical operations.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

If one link is unavailable, the person may remain in detention while the rest of the system waits.

The workforce therefore behaves as a network of dependent capacities, not a single pool of interchangeable staff.

Stage	Typical workforce dependency
Identify / locate	Intelligence analysts, data specialists, Immigration Enforcement teams
Enforcement encounter	Immigration Officers, team leaders, drivers, operational planners
Identity / nationality	Caseworkers, document specialists, embassy liaison, interpreters
Removal decision	Immigration caseworkers, senior caseworkers, legal/policy support
Detention	DCOs, Home Office engagement staff, managers, welfare staff
Healthcare	Nurses, doctors, mental-health and pharmacy services
Legal challenge	Home Office presenting/legal staff, tribunal staff, judges, claimant legal representatives

Stage	Typical workforce dependency
Travel documentation	Caseworkers, foreign-government liaison, consular officials
Movement in UK	Certified detainee escort officers, vehicles, control rooms
Departure	Airport teams, carrier liaison, escorts, charter planners
Overseas escort	Certified escort staff, medical escorts where required, return logistics

5. Frontline Officers Need Training Before They Can Enforce

Home Office careers material from an Immigration Enforcement officer describes five weeks of immigration training followed by two weeks of Personal Safety Training.

That seven-week period is not the whole recruitment lead time. Candidates must first pass recruitment and pre-employment processes.

Home Office security guidance says applicants to Border Force and Immigration Enforcement undergo right-to-work and pre-employment screening, UK Security Vetting and an additional integrity check because of their access to classified information, locations and assets.

Training therefore begins after a recruitment pipeline that itself consumes time and can reject candidates.

Even after formal training, operational competence develops through experience. A mass recruitment programme inevitably changes the ratio of experienced officers to new staff.

6. Specialist Investigators Cannot Simply Be Created From Scratch

Some Immigration Enforcement roles require prior professional accreditation.

For example, a May 2026 Home Office recruitment campaign for criminal investigators required applicants to hold current PIP Level 2 accreditation before appointment.

That matters because Reform's proposed Deportation Command includes intelligence, criminality and enforcement functions that may require experienced investigators rather than generic administrative recruits.

Where the labour market requires existing police-style accreditation, government expansion competes for a finite pool of already trained people.

7. Caseworkers Are the Hidden Production Line

Physical arrest is highly visible, but casework converts an arrest into a legally executable removal.

A June 2026 Immigration Enforcement recruitment campaign describes caseworkers as progressing deportation and removal cases, reviewing evidence, making reasoned decisions, communicating outcomes and managing varied caseloads.

Section 5.10 showed why Reform can narrow legal protections but cannot eliminate every factual question. Somebody still has to decide whether the statutory conditions for removal are met.

At 120,000 completed removals a year, even a very efficient caseworking system would be processing a much larger gross caseload because not every identified or detained person reaches removal on schedule.

8. Training Capacity Can Become the Bottleneck

Large recruitment announcements often count vacancies or appointments. Operational systems need trained productive staff.

The National Audit Office's earlier work on asylum transformation provides a cautionary example: in April 2023 only a fraction of the enlarged asylum caseworker workforce was fully trained and working independently, and increasing headcount did not translate immediately into equivalent decision-making capacity.

The comparison is not a claim that future deportation caseworkers would reproduce exactly the same performance. It demonstrates a general implementation risk: training instructors, mentors and quality-assurance staff themselves become scarce when an organisation expands rapidly.

If experienced staff are diverted to train recruits, short-term productive capacity can fall before it rises.

HEADCOUNT IS NOT PRODUCTIVE CAPACITY

A newly appointed officer, caseworker or custody officer is not equivalent on day one to an experienced employee. A credible workforce model needs at least four numbers: vacancies authorised, recruits appointed, recruits trained/certified, and staff independently productive.

9. A 24,000-Bed Estate Is Also a 24/7 Workforce Estate

Reform's detention proposal magnifies the labour question because secure custody operates continuously.

At the end of March 2026, 1,955 people were held under immigration powers in the detention estate or prisons. Reform proposes 24,000 dedicated detention places — more than twelve times that detained-person snapshot and far above the existing operational estate.

The comparison is not a direct staffing ratio because prisons and different IRCs operate differently. It nevertheless shows that the new estate cannot be staffed by a marginal addition to current contractors.

Secure centres require round-the-clock custody coverage, management, control rooms, reception, visits, welfare, cleaning, catering, maintenance, healthcare and incident response. Leave, sickness,

training and night shifts mean one continuously staffed post requires more than one employee on payroll.

10. Custody Officers Must Be Trained and Certified

Home Office Detention Services Order 02/2018 governs certification of Detainee Custody Officers and Detainee Custody Officer (Escort) staff.

Its June 2026 training annex states that all DCOs must complete mandatory training for their role before certification and that evidence of training must be provided to the relevant Home Office team.

If a certified officer moves into another DCO role, the additional role-specific training must be completed and approved.

This means a contractor cannot lawfully solve a sudden staffing gap merely by moving any available security guard into detainee custody or overseas escort work.

11. Healthcare Scales With Detention Capacity

Immigration detention is not simply a security contract.

Home Office material on Derwentside states that IRCs have dedicated health facilities run by doctors and nurses and that healthcare is commissioned to equivalent community standards.

It also states that detained people are medically assessed by a nurse shortly after arrival and offered access to a doctor.

When Derwentside capacity was being increased, the Home Office explicitly said Home Office and contractor staffing would increase alongside healthcare, legal services and welfare provision.

Reform's 24,000-place model therefore creates demand in labour markets that the Home Office does not control — particularly nursing, medicine and mental-health provision.

12. The NHS Opportunity Cost

Recruiting healthcare staff for a detention estate does not create clinicians from nothing.

If contractors or NHS commissioners recruit nurses, doctors, pharmacists and mental-health professionals into a greatly expanded detention system, those workers must come from domestic training pipelines, overseas recruitment or other employers.

The fiscal cost of the detention estate therefore understates the system cost if expansion intensifies shortages elsewhere in healthcare.

This is an opportunity-cost question rather than evidence that recruitment is impossible. Reform's published costing should nevertheless state the clinical workforce assumption behind 24,000 occupied places.

13. Escorting Is a Separate National Operation

A person cannot be deported merely because a caseworker has completed the paperwork.

The Home Office's 2025 preliminary market engagement for a new Escorting Services contract describes escorting as fundamental to movement within the detention/removal estate and to removal from the UK.

The service covers in-country and overseas escorting and management of short-term holding facilities across the UK and northern France. Overseas removal is predominantly by air and includes both escorted and unescorted cases.

At Reform's target rate, the system would average about 329 removals every day. That implies sustained capacity for vehicles, custody escorts, airport holding, carrier coordination, charter operations and contingency when flights are delayed or cancelled.

Escorted high-risk removals consume more staff per person than straightforward unescorted departures, so nationality and case mix matter as much as the headline number.

14. Interpreters Are Operational Infrastructure

Language capacity appears throughout the system: enforcement encounters, interviews, detention induction, healthcare, legal communication, travel-document work and court proceedings.

The Home Office maintains an Interpreter & Language Service Unit and updated its interpreter code in March 2026.

Separate June 2026 detention guidance sets mandatory instructions for interpretation services and translation devices across IRCs and holding facilities.

Technology can reduce some demand, but high-stakes decisions cannot safely assume machine translation is an adequate substitute in every case.

A mass programme therefore needs language-demand forecasting by nationality, not merely a generic interpreter budget.

15. Courts and Tribunals Are Already a Capacity Warning

The First-tier Tribunal Immigration and Asylum Chamber received approximately 118,000 cases in 2025/26, up 49% on the previous year.

It disposed of approximately 57,000 cases while its open caseload rose to approximately 152,000.

Reform intends to remove or restrict many appeal routes, so it would be wrong simply to add 120,000 removals to today's tribunal receipts.

But Sections 5.9 and 5.10 established that some legal supervision is likely to remain unless Parliament successfully removes it. A rapid increase in detention and removal decisions can therefore increase urgent judicial reviews, detention challenges and whatever statutory review routes survive.

If the legal system is not expanded in parallel, the bottleneck moves from Home Office casework to courts.

16. The NAO Has Already Described the System-Level Problem

The National Audit Office's December 2025 analysis of the asylum system is unusually relevant to Reform's programme because it examines the system as a chain rather than a collection of isolated departments.

The NAO identified capacity constraints across judges, legal aid, caseworkers and accommodation and warned that bottlenecks arise when demand exceeds capacity.

It also found that efforts to increase processing speed have sometimes reduced decision quality or shifted problems elsewhere.

That is exactly the implementation risk created by a 600,000-removal target: accelerating enforcement without matching casework, detention, documentation, escorting and legal capacity can simply produce a larger queue at the next stage.

THE BOTTLENECK RULE

A deportation system can move only as fast as its slowest indispensable stage. Doubling enforcement officers achieves little if travel-document teams, detention beds or escorts are saturated. Doubling detention beds achieves little if caseworkers or destination agreements cannot produce executable removals.

17. A Simple Capacity Illustration

Because Reform has not published a workforce establishment, the report should not invent one. It can, however, show how quickly plausible workloads translate into large staffing requirements.

It excludes supervisors, quality assurance, sickness, leave, training time and cases worked that do not end in removal.

Successful removals completed per productive caseworker per year	FTE needed for 120,000 completed removals
25	4,800
50	2,400
75	1,600
100	1,200
150	800
200	600

The point is not to select one row as “the answer”. Reform should publish the productivity assumption it is actually using. Without it, neither the staffing requirement nor the salary cost can be independently reproduced.

18. Another Illustration: Escort Demand

The same uncertainty applies to escorts.

If only one quarter of 120,000 annual removals required two officers to escort the individual overseas, that would generate 60,000 officer-removal assignments before travel time, overnight stays, failed removals, positioning journeys or supervisory coverage.

If half required two escorts, the figure would be 120,000 officer-removal assignments.

These are workload units, not FTE estimates. A single employee can perform many assignments in a year. The purpose is to show why the escorted/unescorted mix is a necessary input to any credible manpower model.

Share of removals requiring 2 overseas escorts	People escorted	Escort assignments
10%	12,000	24,000
25%	30,000	60,000
50%	60,000	120,000
75%	90,000	180,000

19. Recruitment Competes With Other Public Services

The Home Office is already a very large employer: careers material says around 50,000 people work across the department, while 2024/25 workforce statistics show most employees are in Migration and Borders Operations.

A large Reform recruitment programme would therefore be material even relative to the existing department.

Some recruitment can come from the general labour market. Other roles compete directly with police forces, prisons, the NHS, legal services, government digital teams and other security-cleared employers.

Offering higher salaries can attract workers, but that transfers the pressure into the wage bill and potentially into vacancies elsewhere.

This is another reason a credible costing needs workforce categories rather than a single global detention or deportation figure.

20. Redeployment Has an Opportunity Cost

The present government's reallocation of 1,000 staff shows how quickly capacity can be moved inside government.

But redeployment is not free capacity. Staff moved into Immigration Enforcement cease doing whatever work they previously performed.

Reform could similarly transfer people from UKVI, Border Force or other Home Office functions, but large transfers risk creating visa, asylum, border or passport backlogs elsewhere.

The correct accounting question is therefore not merely “how many staff can be found?” but “from where, with what skills, and what work stops when they move?”

21. Attrition Matters in a Five-Year Programme

Any establishment model covering five years must include turnover.

Some staff will resign, retire, fail training, move internally, become long-term sick or lose certification. Others will be promoted into management and training roles.

A plan that says “recruit 10,000” without modelling annual attrition will progressively fall below its intended operational headcount.

Rapidly expanding secure-custody and enforcement work can also create wellbeing, sickness and retention pressures that need to be priced rather than assumed away.

22. Management and Quality Assurance Scale Too

Mass recruitment creates demand for people who do not themselves arrest or deport anyone: trainers, supervisors, HR staff, vetting teams, auditors, professional standards, procurement officers, contract managers, analysts, health-and-safety staff and quality-assurance teams.

These overhead roles can look unproductive in a headline deportation count, but removing them increases error, misconduct and litigation risk.

Section 5.7’s data-fusion system also creates a need for data engineers, security specialists, information-governance staff and people able to correct erroneous records.

A workforce plan that counts only frontline uniforms therefore understates the establishment required to operate the programme lawfully and reliably.

23. The First-Year Ramp Problem

Reform’s five-year total is often presented as though 120,000 removals simply occur in each of five equal blocks.

That is unlikely if the party must first legislate, procure sites, build or convert detention centres, recruit staff, complete vetting, train officers, certify custody staff, procure escorting capacity and negotiate returns agreements.

If year one delivers fewer than 120,000 removals, later years must exceed 120,000 to preserve the 600,000 total.

For example, if only 50,000 were achieved in year one, the remaining four years would require an average of 137,500 a year. If the first two years totalled 150,000, the final three would require 150,000 a year.

The slower the workforce and estate ramp, the more demanding the mature-state workforce becomes.

Completed in early period	Removals still required	Average needed thereafter
Year 1 = 50,000	550,000 over 4 years	137,500/year

Completed in early period	Removals still required	Average needed thereafter
Year 1 = 75,000	525,000 over 4 years	131,250/year
Years 1–2 = 150,000	450,000 over 3 years	150,000/year
Years 1–2 = 200,000	400,000 over 3 years	133,333/year

24. What a Publishable Workforce Plan Would Need

- Current establishment by function, not merely total Immigration Enforcement headcount.
- Target establishment for Deportation Command by year.
- Number of frontline Immigration Officers and team leaders.
- Caseworker caseload/productivity assumptions and expected unsuccessful-case workload.
- Training instructors, mentoring ratios and time to independent productivity.
- Vetting and integrity-check throughput and expected failure/withdrawal rates.
- DCO and DCO(E) establishment for each detention site and shift pattern.
- Healthcare establishment per occupied detention place.
- Interpreter demand by language and whether capacity is staff, freelance or contracted.
- Escort assumptions: escorted share, staff per escorted removal, journey time and failed-removal allowance.
- Legal/presenting staff and expected judicial-review/tribunal workload.
- Data, intelligence and cyber-security establishment for the Identification Centre.
- Management, quality assurance, professional standards and contract-management overhead.
- Annual attrition and sickness assumptions.
- Salary, pension, overtime/allowance, training and recruitment cost by staff category.
- Year-by-year recruitment and productivity ramp rather than a single end-state headcount.

NO BASIS FOR FALSE PRECISION

The evidence does not support claiming that Reform needs exactly 61,500 Immigration Enforcement employees because its removal target is 12.3 times current enforced returns; that every removal requires an overseas escort; that current staffing productivity will remain unchanged at mass scale; or that recruitment at the required scale is impossible. It also does not support the opposite assumption that detention beds, legislation and technology automatically create operational capacity. The missing evidence is the workforce model connecting Reform's target to trained people by role, place and year.

Policy Feasibility: From Political Promise To Practical Delivery

Evidence-based public interest review • 13 August 2026

5.12 The Detention Economy: Procurement, Contractors and Who Could Profit?

EVIDENCE SUMMARY

Purpose: Map the commercial supply chain that would be created by Reform UK's proposed 24,000-place detention estate and 600,000-removal programme; identify the firms and sectors with demonstrated experience in the existing system; test the procurement constraints on any rapid expansion; and examine, with strict evidential boundaries, whether major Reform donors have financial interests in businesses operating in potentially relevant sectors.

Finding: Immigration detention is already substantially outsourced. Mitie Care & Custody manages Heathrow IRCs and was awarded Dungavel and Derwentside; Serco manages Brook House and Tinsley House and has operated Yarl's Wood. The Home Office separately procures national escorting and related services. A 24,000-place estate would therefore create a very large multi-sector market spanning construction, secure custody, facilities management, healthcare, catering, transport, escorting, technology and security.

The most important donor-related finding is real but must be stated precisely. Christopher Harborne, Reform's dominant financial backer, is the ultimate controlling person behind Klear Kite LLC, which notified a 15.0% holding in QinetiQ Group plc in June 2026. QinetiQ is a major UK defence and security contractor with a £1.5 billion five-year Ministry of Defence extension covering test, training and evaluation at 16 MOD sites. That establishes a substantial financial interest in a government-contracting defence/security company. It does NOT establish that QinetiQ currently operates immigration detention centres, that detention procurement falls naturally within its present core business, that Reform has discussed detention contracts with Harborne or QinetiQ, or that QinetiQ would receive any future contract. No evidence located for this chapter supports such an allegation. The legitimate accountability question is prospective: if a Reform government created a large new security-procurement market, what safeguards would prevent donor relationships, perceived conflicts or privileged access from influencing supplier selection?

Executive Brief

Reform's detention proposal is also an industrial policy decision. Creating 24,000 secure places would direct substantial public expenditure into a relatively concentrated market of custody, facilities-management, construction, healthcare, transport and security suppliers.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

Mitie Care & Custody has managed Harmondsworth and Colnbrook and was awarded Dungavel and Derwentside. Serco was awarded Brook House and Tinsley House through an open procurement

and already operated Yarl's Wood. These firms therefore have directly evidenced immigration-custody experience.

The commercial opportunity extends beyond centre operators. The Home Office's 2026 planned procurement for Escorting and Related Services covers in-country and overseas movement between IRCs, ports, holding rooms and foreign destinations. Construction, maintenance, catering, healthcare, digital systems and specialist security create further supply chains and subcontracting opportunities.

The Procurement Act 2023, in force since February 2025, requires contracting authorities to act and be seen to act with integrity and contains explicit conflict-of-interest provisions. The current Cabinet Office guidance says procurement integrity may be compromised where decisions are influenced by external or private interests.

Extreme urgency does not provide a general route around competition merely because a government has set itself an aggressive timetable. Cabinet Office guidance says the urgency must be extreme and unavoidable, not attributable to the contracting authority and not reasonably foreseeable. A government cannot normally manufacture urgency by allowing insufficient time for procurement.

Past detention procurement shows that direct negotiation can nevertheless occur in genuine urgency. Derwentside was awarded to Mitie after the Home Office concluded that refurbishment and mobilisation times left insufficient time for an ordinary procedure; incumbent IRC suppliers were invited to make proposals and the resulting contract notice recorded a total value of £166 million.

That precedent matters for Reform. A government simultaneously declaring a migration emergency and attempting to construct thousands of places rapidly could face political pressure to use exceptional procurement routes. The legal availability of those routes would depend on the facts and the Procurement Act, not merely on the emergency label.

Christopher Harborne's QinetiQ holding creates a legitimate transparency issue, but not evidence of a promised detention contract. Regulatory notifications show Klear Kite LLC at 15.0% of QinetiQ voting rights in June 2026 and identify Harborne as its ultimate controlling person. QinetiQ's existing public-sector business includes very large MOD contracts and security-related capabilities.

The evidentially responsible conclusion is therefore two-part: Harborne has a substantial economic interest in a company experienced in major UK government defence/security contracting; but no evidence identified here shows that QinetiQ is an incumbent immigration-detention operator, has bid for Reform's hypothetical estate, or has been selected, promised or favoured for it.

This distinction should be preserved throughout the report. The investigation should follow ownership, capabilities, lobbying/access, procurement notices and eventual awards. It should not infer a corrupt bargain from donation plus commercial relevance alone.

1. Reform Is Proposing a New Commercial Market, Not Merely More Beds

A 24,000-place detention estate would require land, planning, design, construction or conversion, secure perimeter systems, custody operations, facilities management, food, cleaning, healthcare, communications, IT, surveillance, transport and maintenance.

At the same time, 120,000 removals a year would create demand for escorting, charter capacity, airport holding, travel-document logistics and data systems.

The public debate can therefore understate the policy by describing it as “building detention centres”. In commercial terms it is a portfolio of long-duration service and infrastructure contracts with continuing operating expenditure after construction ends.

That matters for accountability because the beneficiaries are not confined to whoever pours the concrete. A centre operator can subcontract food, maintenance, healthcare technology, security equipment and specialist services to many additional firms.

Commercial layer	Likely requirement	Existing evidence of outsourcing
Design / construction	New secure sites, conversions, refurbishment, utilities	Government construction and specialist contractors
Custody operation	24/7 DCO staffing, welfare, control rooms	Mitie / Serco in existing IRC estate
Facilities management	Maintenance, cleaning, estates, energy	Bundled into or subcontracted from operating contracts
Healthcare	Primary care, nursing, mental health, pharmacy	Dedicated healthcare required in IRCs
Catering	Large-scale secure-site food provision	Provided within existing centres / contractor supply chains
Escorting	Vehicles, custody escorts, ports, overseas removals	Separate Home Office national procurement
Technology	Case systems, access control, CCTV, biometrics, networks	Public-sector technology and security supplier market
Physical security	Perimeters, monitoring, secure infrastructure	Specialist security / custody supply chain
Transport / aviation	Scheduled flights, charters, overseas logistics	Carrier and charter procurement / operational contracts

2. The Existing Operator Market Is Concentrated

The present estate already relies heavily on large outsourcing companies with specialist custody experience.

In 2021 the Home Office announced that Mitie Care & Custody would manage Dungavel and Derwentside. The same announcement noted that Mitie already managed Harmondsworth and Colnbrook at Heathrow.

In 2020 the Home Office awarded Serco the contract to manage Brook House and Tinsley House at Gatwick following an open procurement. The department also noted that Serco already managed Yarl's Wood.

These are not the only companies capable of participating in future procurements, and historic operators such as G4S and GEO demonstrate that the supplier set changes over time. But incumbency matters: existing operators possess certified staff, custody systems, mobilisation experience and Home Office contract knowledge that new entrants would have to acquire.

INCUMBENCY ADVANTAGE

Rapid expansion tends to favour firms that already understand the detention regime, hold relevant systems and employ trained custody staff. That is not evidence of impropriety; it is a structural procurement fact. It also means a 24,000-place expansion could concentrate substantial public expenditure among a relatively small number of experienced suppliers unless contracts are deliberately structured to widen competition.

3. Mitie: Directly Relevant Existing Capability

Mitie is the clearest example of a company with current, directly evidenced relevance to Reform's proposed detention expansion.

The Home Office awarded Mitie contracts for Dungavel and Derwentside and recorded that it already managed Harmondsworth and Colnbrook.

The Dungavel award followed a competitive procedure with negotiation. The Home Office described improvements including additional on-site staff and dedicated welfare provision.

For Derwentside, the procurement history was different: the Home Office used an urgency-based negotiated route after concluding there was insufficient time for an ordinary procurement and mobilisation. The published notice recorded a contract value of £166 million.

This combination - incumbent expertise plus experience of both competitive and urgent mobilisation - makes Mitie an obvious member of the realistic supplier universe for any future expansion. It does not mean Mitie would win Reform-era contracts.

4. Serco: Another Directly Relevant Incumbent

Serco is likewise part of the evidenced incumbent market.

The Home Office awarded Serco Brook House and Tinsley House in 2020 after an open procurement. The contract was scheduled to run to 2028 with an option to extend to 2030.

The award included increased staffing, welfare provision, safeguarding training and performance monitoring, illustrating that an IRC operating contract buys substantially more than guard labour.

Serco already managed Yarl's Wood at the time of the Gatwick award. A Reform expansion would therefore encounter a supplier with established immigration-custody operating experience, workforce systems and government contracting infrastructure.

5. Escorting Creates Another Major Contract Stream

The commercial chain does not end at the detention-centre gate.

The Home Office's February 2026 planned procurement for Escorting and Related Services covers in-country and overseas escorting between IRCs, ports, holding rooms, residential short-term holding facilities and foreign destinations.

The notice describes the escorting contract as fundamental to both the functioning of the detention/removal estate and actual overseas removal.

Reform's 120,000-a-year target would therefore create a major transport-and-custody workload even if every detention centre itself were fully staffed.

6. Construction Is Only the First Procurement Wave

Construction expenditure is politically visible because new centres require sites and buildings. Operating expenditure can be more persistent.

A secure centre built quickly still requires years of staffing, maintenance, food, healthcare, utilities, technology, cleaning and transport.

If Reform uses modular or converted facilities to accelerate opening, that may change the construction supplier mix but not remove the operating contracts.

The correct fiscal analysis should therefore separate capital expenditure from annual contracted services and whole-life cost.

7. The Procurement Act 2023 Creates an Integrity Framework

The Procurement Act 2023 has applied since 24 February 2025 and would form the default legal framework for covered procurements undertaken by a future Reform government.

Cabinet Office guidance on conflicts of interest says contracting authorities must have regard to acting, and being seen to act, with integrity. It explicitly recognises that procurement integrity may be compromised where external or private interests influence a procurement.

The Act also strengthens exclusion and debarment mechanisms, including for supplier misconduct and national-security concerns.

For a programme politically associated with very large donors, these provisions make documentation of ministerial contacts, conflict assessments, market engagement and award reasoning especially important.

8. A Political "Emergency" Does Not Automatically Permit Direct Awards

One obvious risk in a rapid 24,000-place build is pressure to bypass lengthy competition.

Current Cabinet Office direct-award guidance permits an urgency justification where the required goods, services or works are strictly necessary because of extreme and unavoidable urgency.

But the guidance says the urgency must not be attributable to an act or omission of the contracting authority and must not have been reasonably foreseeable.

It specifically warns that unavoidable urgency does not apply merely because the authority failed to allow sufficient time for procurement.

Therefore, a government that announces a five-year political target cannot automatically convert its own timetable into a lawful urgency justification.

EMERGENCY ≠ BLANK CHEQUE

Reform's proposed migration-emergency legislation could change substantive immigration law. It would not, by itself, erase public-procurement duties. Any direct award would need its own lawful justification under the procurement regime applicable to that contract.

9. But Derwentside Shows Why Urgent Procurement Deserves Scrutiny

The Derwentside procurement provides a concrete precedent for detention expansion under time pressure.

The published award notice says extensive refurbishment left insufficient time for a procurement under the ordinary procedures and for fit-out and mobilisation. The Home Office therefore negotiated directly under the then-applicable urgency provision after inviting incumbent IRC suppliers to submit short proposals.

The contract was awarded to Mitie Care & Custody and the notice recorded a total value of £166 million.

The lesson is not that the award was improper. The lesson is that urgent detention policy can materially narrow the competitive route and favour suppliers already capable of rapid mobilisation.

If Reform attempted several large sites simultaneously, the cumulative use of urgency or direct-award mechanisms would warrant close scrutiny.

10. National Security Can Complicate the Supplier Pool Further

Some technology or security contracts associated with a large detention-and-identification system may have national-security sensitivities.

The Procurement Act introduced specific national-security exclusion and debarment powers. Cabinet Office guidance says authorities must assess threats posed by suppliers, associated persons and intended subcontractors in covered procurements.

Certain contracts may also be exempt from normal competitive rules where national-security exemptions genuinely apply.

This is relevant because Reform's proposed Identification Centre combines data, intelligence and enforcement. The more the programme is characterised as security infrastructure, the more important transparent explanation of procurement routes and exemptions becomes.

11. The Donor Overlay: What We Can and Cannot Infer

The existence of a donor with investments in a relevant commercial sector is an accountability fact, not proof of corruption.

Political donors are legally entitled to hold investments and companies are legally entitled to compete for public contracts. A shareholder also does not normally control procurement decisions made by the company's management or by government.

The evidential threshold rises sharply when moving from "commercial exposure" to "influence", "preferential treatment" or "contract promised". Those stronger propositions require evidence such as communications, meetings, tender manipulation, non-public information, irregular scoring, unexplained direct awards or other documentary links.

This report should therefore use a three-level test: documented financial interest; documented policy/procurement relevance; documented influence or preferential treatment. The first two may justify scrutiny. Only evidence of the third justifies a corruption-style allegation.

Evidence level	What may responsibly be said	What may NOT be inferred
1. Financial interest	Donor owns/controls a disclosed interest in company X	Company X has been promised public work
2. Sector relevance	Company X has capabilities/contracts relevant to government security/infrastructure	Company X will win the detention contract
3. Access / contact	Donor/company representatives met relevant politicians or officials	Meeting caused an award without further evidence
4. Procurement evidence	Bid, award, scoring, direct-award notice or contract can be examined	Impropriety unless evidence supports it
5. Preferential-treatment evidence	Irregular intervention or advantage can be documented	Broader conspiracy beyond documented facts

12. Christopher Harborne: The Financial Interest Is Now Clearer

Regulatory market notifications provide unusually strong evidence of Harborne's current QinetiQ exposure.

A QinetiQ major-holdings notification published in June 2026 records Klear Kite LLC with 15.000000% of voting rights, representing 77,805,044 shares, and identifies Christopher Harborne as the ultimate controlling person.

An earlier QinetiQ notification in 2022 stated that Harborne remained the sole ultimate beneficial owner and controller when his QinetiQ holding was transferred from AML Global Ltd to Klear Kite LLC.

This is therefore not a vague "interest" or an inference from press reporting. It is a disclosed major shareholding linked to Harborne through regulatory notifications.

DOCUMENTED HARBOURNE–QINETIQ LINK

As at the June 2026 major-holdings notification examined for this report, Klear Kite LLC held 15.0% of QinetiQ voting rights and Christopher Harborne was identified as its ultimate controlling person. This establishes substantial economic exposure to QinetiQ. It does not establish operational control of QinetiQ, involvement in its tender decisions, or any agreement with Reform about future public contracts.

13. QinetiQ: A Major Government Defence and Security Contractor

QinetiQ describes itself as a global defence and security company delivering mission-critical solutions across test and training, mission support, research and development and engineering services.

In May 2025 the Ministry of Defence announced a five-year £1.5 billion extension with QinetiQ for test, trial, training and evaluation across 16 MOD sites, supporting more than 1,200 UK jobs.

QinetiQ's own earlier description of its Long Term Partnering Agreement likewise records long-duration operation and modernisation of MOD-owned facilities.

These facts establish that QinetiQ is experienced in large, sensitive UK government contracts and secure defence environments.

14. What QinetiQ Evidence Does NOT Show

CRITICAL EVIDENTIAL BOUNDARY

No source located for this chapter shows QinetiQ operating a UK Immigration Removal Centre, holding the national immigration escorting contract, bidding for Reform's hypothetical detention estate, discussing such contracts with Reform, receiving a promise of future work, or being selected as a preferred supplier. QinetiQ's major MOD role makes the Harborne connection relevant to procurement-governance scrutiny; it does not make a future detention award probable, still less proven.

This boundary is especially important because QinetiQ's core published activities are defence technology, test, evaluation, training, engineering and mission support rather than the day-to-day custody operation currently performed by Mitie and Serco.

If future detention projects required secure-site technology, surveillance, cyber, data, engineering or specialist security support, companies from the broader defence/security market could conceivably compete or subcontract. That is a market possibility, not evidence about QinetiQ specifically.

The correct investigative posture is therefore to monitor procurement notices and company disclosures rather than predict an award.

15. Why the Harborne Link Still Matters

The absence of evidence of a promised contract does not make the connection irrelevant.

Harborne is both a major political financier and the ultimate controlling person behind a major holding in a company whose revenues include substantial UK government defence/security work.

If a Reform government dramatically enlarged government spending on secure infrastructure, technology or security services, the public would have a legitimate interest in knowing whether Harborne or QinetiQ representatives had access to ministers involved in shaping or awarding that spending.

That creates a governance requirement for stronger transparency, not a presumption of guilt.

16. The Procurement Safeguards a Reform Government Should Publish in Advance

- A register of ministers' and special advisers' meetings with potential detention, security and technology suppliers.
- A register of meetings with major party donors whose businesses or investments overlap with programme procurement sectors.
- Conflict-of-interest assessments for ministers, advisers and senior officials involved in procurement strategy or awards.
- Advance publication of market-engagement participants wherever lawful.
- Clear reasons for contract packaging, including why lots are or are not used to broaden competition.
- Publication of direct-award justifications and transparency notices in accordance with the Procurement Act.
- Independent commercial assurance for high-value or urgency-based awards.
- Beneficial-ownership disclosure for bidding entities and relevant subcontractors.
- Publication of key performance indicators and contract-performance data after award.
- A prohibition on political fundraising discussions during procurement-related contacts.
- A documented recusal process where a minister has a relevant donor relationship or personal conflict.
- A searchable cross-reference between major political donors and suppliers receiving programme contracts.

17. The Concentration Risk

Rapid expansion can create supplier concentration even without political influence.

Existing operators have trained staff, mobilisation experience and established systems. New entrants face certification, recruitment and operational barriers described in Section 5.11.

If only a small number of firms can credibly mobilise large secure sites at speed, government bargaining power may weaken and the risk of supplier dependency increases.

Breaking the programme into lots could widen participation, but excessive fragmentation creates integration and accountability problems. Large bundled contracts simplify management but can entrench incumbents.

Reform's costing should therefore disclose its assumed contracting model: a few national prime contractors, site-by-site competition, regional lots or direct government operation.

18. The Subcontractor Problem

A prime contract does not identify every commercial beneficiary.

Custody operators can procure catering, maintenance, cleaning, technology, training, vehicles and other services from subcontractors. Construction primes can similarly use extensive supply chains.

Donor-interest screening limited to the name on the main contract could therefore miss economically relevant relationships further down the chain.

The Procurement Act's treatment of associated persons and intended subcontractors in some exclusion contexts reinforces the broader governance point: subcontractors matter.

A serious accountability exercise should therefore record material subcontractors and beneficial owners, not merely prime contractors.

19. Profit Is Not Itself Evidence of Impropriety

Private contractors are expected to earn a return. The policy question is whether outsourcing produces value, performance and accountability compared with public operation.

The existence of profit therefore should not be used rhetorically as though it proves corruption.

The more useful questions are whether competition was genuine, the price was benchmarked, performance standards are measurable, penalties are enforceable, contract changes are transparent and political relationships were managed properly.

This keeps the investigation focused on evidence rather than motive attribution.

20. The "Emergency Procurement" Incentive Problem

Reform's political promise creates an unusual incentive structure: it needs visible detention capacity quickly in order to demonstrate that the programme has begun.

That can make slower competitive processes politically unattractive even where they may deliver better price discovery.

At the same time, procurement law does not normally permit a government to create its own urgency and then cite that urgency as the reason competition is impossible.

The tension between political timetable and procurement integrity should therefore be monitored from the first site announcement, not only after contracts have been awarded.

21. A Prospective Contractor Watchlist

The report should maintain a living contractor watchlist rather than predict winners.

The first tier should contain existing IRC operators and escorting providers because their relevance is directly evidenced.

The second tier should contain firms appearing in official market-engagement or procurement notices for new sites, technology, security, healthcare or transport.

The third tier should contain donor-connected businesses only where a demonstrable commercial capability overlaps with an actual procurement requirement.

Promotion from “watchlist” to “potential beneficiary” should require an objective event such as market engagement, bid participation, subcontracting or award.

Category	Current evidential status	Treatment in report
Mitie Care & Custody	Existing IRC operator	Directly relevant incumbent
Serco	Existing IRC operator	Directly relevant incumbent
Other historic / future custody suppliers	Market precedent or future procurement evidence needed	Monitor
Escorting bidders / provider	Official procurement process	Update when award/bidders become public
QinetiQ	Major defence/security government contractor; Harborne-linked 15% holding	Relevant donor-linked security exposure; NOT identified as IRC operator
Other donor-connected companies	Require company-by-company capability and ownership evidence	Do not infer relevance from donation alone

22. What Would Constitute a Genuine Red Flag?

- A donor-connected company entering a procurement shortly after private policy meetings that were not disclosed.
- A direct award to a donor-connected supplier where the urgency was foreseeable or created by government delay.
- Tender specifications unusually tailored to one supplier without an evidenced operational reason.
- Intervention by ministers or political advisers in scoring, shortlisting or commercial negotiations outside the documented process.
- Access to non-public procurement information before competitors receive it.
- Unexplained changes to evaluation criteria or contract scope benefiting a connected bidder.

- A donor or connected person receiving a material economic benefit through an undisclosed subcontract.
- Failure to declare or manage a conflict identified under the Procurement Act framework.

23. What Would NOT Constitute Proof?

- A company winning a contract merely because one of its shareholders donated to Reform.
- An incumbent custody contractor winning work for which it has demonstrable experience.
- A defence/security company expressing interest in a security-related government procurement.
- A minister meeting industry during documented market engagement.
- A donor owning shares in a publicly traded company that independently wins government work.
- A contract award that appears politically uncomfortable but follows a documented competitive process.

24. The Investigation Protocol Going Forward

- Capture every Find a Tender notice relating to Reform-era detention construction, operation, escorting, surveillance, data, healthcare and facilities management.
- Record all suppliers participating in preliminary market engagement, not only eventual winners.
- Check Companies House and regulatory major-holdings disclosures for beneficial ownership and controlling interests.
- Cross-reference directors, significant shareholders and parent companies against the cleaned Reform donor dataset.
- Check ministerial transparency returns, hospitality and meetings for supplier and donor contacts.
- Compare award route: competitive tender, framework call-off, direct award, national-security exemption or other route.
- Record contract value, duration, extensions, variations and material subcontractors.
- Distinguish chronology carefully: donation before policy, donation after policy, meeting before procurement, bid before/after meeting and award date.
- Never describe correlation as causation without documentary evidence.

NO EVIDENCE OF A PROMISED QINETIQ DETENTION CONTRACT

The evidence examined does not establish that Reform has selected QinetiQ to build, secure or operate detention centres; that Christopher Harborne has asked for such a contract; that his donations were made in exchange for government work; that QinetiQ currently operates UK immigration detention centres; or that a future QinetiQ award would, by itself, prove corruption. Those claims would require evidence that has not been identified. The relevant evidential questions are the financial interest, the company's government-contracting capability, any future procurement participation, and the transparency safeguards applied to any award.

Policy Feasibility: From Political Promise To Practical Delivery

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

EVIDENCE SUMMARY

Purpose: Combine the legal, diplomatic, physical, commercial and workforce constraints identified in Sections 5.1–5.12 into a single implementation sequence. The relevant test is not whether each component is theoretically possible in isolation, but whether enough of them can become operational at the same time to produce 600,000 completed removals within five years.

Finding: Reform can begin many workstreams on day one: legislation, treaty notices, procurement planning, recruitment, data-system design, site surveys and diplomatic engagement can run in parallel. But the programme contains non-compressible or externally controlled gates. ECHR denunciation requires six months' notice; Refugee Convention and CAT denunciation require one year; ECAT withdrawal takes roughly three months. Foreign readmission agreements cannot be dictated by Westminster. Secure detention sites must be designed, procured, constructed, staffed and commissioned. Current Home Office experience is revealing: its major programme to add 1,000 Campsfield/Haslar beds has a phased delivery plan extending to 2030 and carries an Amber delivery-confidence rating.

The five-year arithmetic therefore becomes progressively harsher when the machine ramps slowly. Every removal not completed in the first two years must be recovered in years three to five. A programme delivering only 150,000 removals in its first two years would need 150,000 per year thereafter; if only 100,000 were achieved in the first two years, the remaining requirement rises to about 166,667 per year. The critical question is therefore not "can Reform eventually build the system?" but "how quickly does the system reach sustained mature throughput?"

Executive Brief

Reform's public policy commits to a five-year emergency programme, up to 24,000 detention places, a new Deportation Command, return agreements with foreign governments and up to five

deportation flights per day. Those elements form an integrated programme rather than a list of independent promises.

The first implementation mistake would be to schedule them sequentially. A serious government would have to start legislation, treaty withdrawal, procurement, recruitment, site development, data integration and diplomacy simultaneously.

Some legal clocks are fixed externally. Article 58 of the ECHR requires six months' notice. Article 44 of the Refugee Convention and Article 31 of CAT each require one year. ECAT denunciation takes effect after approximately three months. Domestic legislation can be drafted and enacted during those periods, but the international obligations do not disappear on election night.

The existing Immigration Removal Centre Expansion Programme provides the strongest infrastructure comparator. It is adding 1,000 beds through Campsfield and Haslar, uses dedicated major-project governance, Treasury/Cabinet Office approvals and Ministry of Justice construction expertise, and has a phased delivery plan extending through 2030. The Home Office's own assessment identifies construction complexity, material supply and recruitment/retention as live risks.

Reform is proposing not 1,000 additional places but 24,000. Even if emergency legislation and standardised designs accelerated procurement and planning dramatically, the programme would still need multiple sites, utilities, operators, healthcare, custody staff, commissioning and transport networks to come online in parallel.

Foreign cooperation creates another critical path outside UK control. The current UK–France agreement returned 1,087 people to France between August 2025 and June 2026. That proves bilateral returns can work, but also shows how much process and consent sit behind a completed transfer.

The existing government is already increasing Immigration Enforcement staffing by 60% from its 2024 baseline during 2026–27. Reform's required mature-state throughput remains around 12 times the latest annual enforced-return volume, so it would inherit an organisation already in rapid expansion and need to accelerate it again.

The programme therefore has two different clocks: the parliamentary clock and the delivery clock. Parliament may pass a bill quickly. Buildings, vetting, training, foreign negotiations and operational learning curves do not necessarily move at legislative speed.

The central conclusion is conditional rather than absolute. There is no single fact proving that 600,000 removals in five years are physically impossible. But Reform has not published a critical-path programme showing how all indispensable components reach the capacity necessary to make the arithmetic close.

1. A Policy Programme Is a Dependency Network

Large government programmes fail when milestones are treated as headlines rather than dependencies.

Each workstream can advance independently for part of the programme. Eventually, however, they meet at one outcome: a named individual actually leaves the UK and is admitted to a destination.

The throughput of the whole system is therefore determined by the slowest indispensable dependency at the moment each removal is attempted.

Workstream	Can start immediately?	Must be complete before mature throughput?	External dependency?
Primary legislation	Yes	Core powers must be operational	Mainly domestic
Treaty withdrawal notices	Yes	Depends which protections Reform intends to bypass internationally	Notice periods fixed by treaty
Detention estate	Design/procurement can start	Sufficient operational beds required for coercive scale	Suppliers, planning, utilities, labour
Workforce	Recruitment can start	Staff must be vetted/trained/certified	Labour market / vetting capacity
Data-fusion / identification	Design can start	Accurate case pipeline required	Legacy data, suppliers, partner systems
Return agreements	Negotiation can start	Required for many cohorts/routes	Foreign sovereign governments
Travel documents	Existing work continues	Required case by case	Foreign embassies/authorities
Flights / escorts	Procurement can start	Capacity required at departure stage	Carriers, escorts, destination permissions

2. Day One Is a Starting Gun, Not an Operational State

Reform repeatedly uses the language of immediate action. A government can indeed make several important decisions on its first day.

It can introduce or publish legislation, issue treaty-denunciation notices, establish ministerial programme governance, launch recruitment competitions, commence market engagement, instruct officials to identify sites and begin diplomatic negotiations.

What it cannot do on day one is retrospectively create the elapsed time those processes require.

A critical-path plan therefore distinguishes “decision taken” from “capability operational”.

DECISION ≠ CAPABILITY

Signing a treaty-withdrawal notice is not the same as withdrawal taking effect. Publishing a procurement notice is not the same as an operational detention centre. Advertising jobs is not the same as having trained officers. Announcing a return agreement is not the same as completing 10,000 returns a month.

3. The Treaty Clocks Start Immediately — and Keep Running

Instrument	Earliest effect after valid notice	Critical-path implication
ECAT	Roughly 3 months	Fastest of the major listed treaty exits
ECHR	6 months	“Immediate” withdrawal is legally a notice on day one, not completed exit
Refugee Convention	1 year	International obligations continue during first programme year
Convention Against Torture	1 year	International obligations continue during first programme year

These clocks can run in parallel. Reform does not have to wait for ECHR withdrawal before giving notice under the Refugee Convention or CAT.

But parallel notice does not remove the first-year legal transition. If Reform’s operational model depends on international obligations actually having ceased, the full claimed legal reset cannot exist until the slowest relevant notice period has expired.

Domestic legislation may attempt to disapply treaty-derived protections earlier, but Section 5.9 established that domestic authority and international responsibility are different questions.

4. The Legislative Path Can Be Fast — But It Is Not Frictionless

A government with a stable Commons majority can prioritise a flagship bill and move it through Parliament quickly.

But the Mass Deportation Bill envisaged by Reform would be unusually broad: asylum eligibility, detention, bail, appeals, treaty interaction, data sharing, warrants, biometrics, removal powers and emergency provisions all interact with existing statutes.

Speed therefore creates its own drafting risk. The more legislation attempts to displace existing protections and judicial routes in one instrument, the greater the need for careful transitional provisions and operational guidance.

Royal Assent is also not identical to operational commencement. Complex legislation commonly requires regulations, commencement orders, statutory guidance, forms, IT changes and staff training before every provision can be used safely.

5. The Detention Estate Is the Longest Domestic Physical Workstream

The existing Home Office expansion programme is the most relevant real-world benchmark for secure immigration infrastructure.

Its Senior Responsible Owner letter records a phased delivery plan through 2030 for 1,000 additional places at Campsfield and Haslar.

The programme is governed as a Government Major Projects Portfolio initiative. Investment decisions pass through Home Office governance and can require Treasury and Cabinet Office scrutiny.

The Home Office's Accounting Officer Assessment rated programme delivery confidence Amber and identified construction complexity, supply-chain pressures and recruitment/retention as live risks.

Campsfield Phase 1 opened in December 2025 with 160 places. Haslar's further development remained in the Crown-development planning process in August 2026.

Reform can legislate to accelerate planning and standardise designs. It cannot make construction complexity, utilities, site remediation, fire/safety commissioning or labour availability disappear.

THE 1,000-v-24,000 COMPARATOR

The current state treats 1,000 additional detention beds as a major programme with a delivery plan extending to 2030. Reform proposes 24,000 places within its five-year emergency programme. The comparison does not prove Reform needs the same timetable; it establishes how large the acceleration assumption is.

6. Procurement Can Be Accelerated — But Planned Urgency Has Limits

Section 5.12 showed that urgent procurement routes exist and that the Home Office has previously used accelerated arrangements for detention services.

However, current Procurement Act guidance says the "extreme and unavoidable urgency" justification does not apply merely because a contracting authority failed to allow enough time for procurement. The urgency must not be attributable to the authority and must not have been reasonably foreseeable.

A Reform government would know from day one that it intended to build and operate the estate. That makes routine reliance on unforeseeable-urgency provisions difficult as a substitute for programme planning.

The practical route is therefore likely to involve parallel competitions, frameworks, existing supplier capacity and possibly new legislation where Reform seeks to alter procurement constraints. Each of those approaches still requires contract specification, due diligence, mobilisation and contract management.

7. Workforce Can Ramp in Parallel — Not Instantly

Section 5.11 established that the state can begin recruitment immediately but that appointments pass through vetting, integrity checks, training and, for custody roles, certification.

The current government is already increasing Immigration Enforcement staffing by 60% from its 2024 baseline during 2026–27, demonstrating both that rapid workforce expansion is possible and that it takes organised investment.

An incoming Reform government would inherit some of that enlarged workforce. That is a genuine advantage compared with building a Deportation Command from a cold start.

But Reform's mature throughput target remains dramatically higher than today's enforced-return volume. The workforce programme must therefore expand while simultaneously supplying trainers, mentors, supervisors and quality assurance.

The first year of mass recruitment is likely to produce a larger gap between nominal headcount and independently productive staff than later years.

8. The Identification System Has Its Own Integration Clock

Reform's Illegal Migrant Identification Centre is intended to fuse information from the Home Office, police, HMRC, DVLA, banks and NHS-related systems.

Technically, government can begin data-sharing design rapidly where legislation permits it.

Operational integration nevertheless requires data standards, matching rules, interfaces, security accreditation, audit logging, error correction, access controls and testing.

Section 5.7 demonstrated why the programme cannot simply prioritise speed: an inaccurate system increases raids on wrong or outdated addresses and consumes the same enforcement capacity the system is meant to optimise.

The identification centre can therefore start producing value before it is complete, but its accuracy and coverage should be expected to mature over time rather than appear fully formed at commencement.

9. Foreign Agreements Are the Least Schedulable Workstream

Domestic project managers can set deadlines for contractors and civil servants. They cannot impose equivalent delivery dates on sovereign foreign governments.

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared***

requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.

Albania demonstrates that ambitious cooperation can materially accelerate returns. Afghanistan demonstrates the opposite: where the documentary and diplomatic mechanism is absent, UK detention and legislation do not create throughput.

The programme therefore needs a country-by-country negotiation pipeline, prioritising cohorts where agreement can unlock large numbers quickly.

An unresolved agreement affecting a large nationality cohort can remove thousands of cases from the programme's usable pipeline regardless of how many beds or officers have been created.

10. France Is a Useful Reality Check

The existing UK–France readmission pilot is valuable because it is a newly constructed bilateral returns mechanism operating in real time.

Between commencement on 6 August 2025 and 30 June 2026, 1,087 people were returned from the UK to France.

Monthly returns increased as the scheme matured: from 17 in September 2025 to 264 in June 2026.

That trajectory demonstrates successful operational ramp-up. It also demonstrates that a signed agreement does not instantly produce mature volume.

Reform's Operation Fortress requires a much larger French or Belgian reception mechanism if interception is to end in return rather than UK disembarkation.

11. The Programme Has a "Minimum Viable Machine" Before It Has a Full Machine

Reform would not need to wait until all 24,000 detention beds exist before conducting removals.

Existing detention centres, current enforcement teams, current returns agreements and voluntary-return mechanisms would continue operating while the new programme ramps.

This is important because otherwise the five-year target would be even less plausible: year-one removals can and would come from inherited capacity.

The correct modelling question is therefore incremental. How far above the inherited baseline can Reform push removals in year one, and how fast do the new systems add further capacity?

That is why the current annual baseline should be treated as the programme's starting platform rather than zero.

12. The Critical Path Is Not Necessarily the Same in Every Year

In the opening months, legislation and authority may be the dominant constraint for novel powers.

As those powers commence, workforce and detention mobilisation may become the dominant domestic constraints.

Once physical and human capacity expands, foreign documentation and destination acceptance may become the binding limit, as Section 5.3 predicted.

Later still, long-stay unremovable detainees can consume detention capacity and reduce turnover.

The programme manager must therefore expect the bottleneck to migrate rather than believe one intervention permanently solves it.

Programme phase	Likely dominant constraints
Months 0–6	Legislation, commencement, ECHR clock, procurement/recruitment mobilisation, early diplomacy
Months 6–12	Treaty transition, trained-workforce ramp, first new sites, data integration, return agreements
Year 2	Estate construction/mobilisation, casework quality, documentation, escort/flight scaling
Years 3–4	Destination acceptance, mature workforce productivity, long-stay detention, contract performance
Year 5	Catch-up arithmetic, hard-to-remove residual cohort, sunset/transitional issues

13. What Can Truly Run in Parallel?

- Notifying treaty withdrawal while drafting legislation.
- Recruiting officers while procuring detention operators.
- Developing multiple detention sites at the same time.
- Negotiating different return agreements simultaneously.
- Building data systems while continuing current enforcement activity.
- Expanding charter/escort capacity while voluntary-return incentives operate.
- Training new staff while experienced teams continue existing removals.
- Preparing secondary legislation and guidance while the main Bill passes through Parliament.

14. What Cannot Be Parallelised Away?

- A one-year treaty notice cannot be made one month merely by hiring more lawyers.
- A particular individual cannot be deported before the required destination/documentation conditions exist.
- A custody officer cannot be operational before required training and certification.
- A detention block cannot safely hold people before construction and commissioning are complete.
- A foreign government cannot be forced to sign a return agreement because the UK project plan says it is late.
- A failed identity match cannot become accurate by sending more officers to the wrong address.
- A removed person cannot be counted before the return is actually completed.

- Lost early-year throughput cannot be recovered without raising later-year throughput above the original annual average.

15. The Catch-Up Arithmetic

The five-year total creates a mathematical consequence that is independent of political opinion.

If the programme begins below 120,000 annual removals while its infrastructure ramps, the later system must exceed 120,000 per year.

This matters because the later cohort may also be harder to remove: easy voluntary departures, well-documented nationals and cooperative destinations are likely to be disproportionately represented earlier.

The following table is arithmetic, not a forecast.

Removals completed in Years 1–2	Remaining for Years 3–5	Average required in each of Years 3–5
100,000	500,000	166,667/year
150,000	450,000	150,000/year
200,000	400,000	133,333/year
240,000	360,000	120,000/year
300,000	300,000	100,000/year

THE RAMP PENALTY

The five-year target rewards early capacity disproportionately. If Years 1–2 deliver only 100,000 removals combined, mature operations must sustain about 166,667 a year for the final three years — roughly 17 times the latest annual enforced-return volume.

16. Illustrative Ramp Scenarios

Because Reform has not published a year-by-year implementation schedule, the report should not invent a preferred forecast.

It can, however, illustrate the consequences of different ramps. Each scenario below totals 600,000 and therefore shows the annual throughput the mature system must eventually reach.

They are deliberately labelled scenarios rather than predictions.

Scenario	Year 1	Year 2	Year 3	Year 4	Year 5
Flat from start	120k	120k	120k	120k	120k
Moderate ramp	60k	100k	140k	150k	150k
Slow estate ramp	40k	80k	150k	165k	165k
Very slow first two years	30k	70k	160k	170k	170k

17. "Flat From Start" Is the Most Demanding Assumption in Year One

A flat 120,000-per-year model looks simple on paper but requires mature-state capability almost immediately.

That would mean the new government reaches an annual removal rate more than twelve times current enforced returns while treaty clocks, estate construction, recruitment and diplomacy are still in transition.

The inherited voluntary-return and enforcement system helps, but it does not eliminate the step change.

Unless Reform publishes evidence that substantial preparatory work can be completed before taking office, the flat scenario should be treated as the most aggressive year-one assumption.

18. The Slower Ramps Are Harder at the Back End

A slower ramp is more consistent with how large programmes normally mobilise.

But it creates a different problem: Years 3–5 must reach 150,000–170,000 removals a year in the illustrative scenarios.

At that stage, the programme may also be dealing with a less cooperative residual population and destinations where documentation is slower.

Infrastructure delay therefore does not merely postpone success. It can change the composition of the people left to remove and make the catch-up target harder.

19. Five Flights a Day Must Also Ramp

Reform says the Home Office will charter up to five deportation flights a day.

Even if aircraft procurement is easier than constructing detention centres, the flight operation depends on manifests, escorts, destination permissions and viable passengers.

A flat five-flights-a-day schedule from the start would be wasteful if the casework pipeline cannot fill them.

The aviation contract should therefore be scheduled against case-ready throughput rather than used as a symbolic day-one capacity measure.

20. A Credible Critical-Path Programme Would Show Milestones

Indicative milestone window	What Reform would need to demonstrate
Day 1–30	Treaty notices; Bill introduced; SRO/programme governance; procurement strategy; site shortlist; recruitment launch; diplomatic priority list
Months 2–3	ECAT exit potentially effective; first recruitment cohorts in training; market engagement; preliminary site/design packages; data architecture
Month 6	ECHR exit potentially effective; first new operational teams; early bilateral deals where achievable; existing estate intensified
Month 12	Refugee Convention/CAT withdrawal potentially effective; first-year outturn; first major new estate capacity must be commissioning if five-year total is to remain plausible
Months 12–24	Multiple sites opening; workforce/productivity scaling; country agreements broaden; charter/escort capacity mature
Years 3–4	Near-maximum programme throughput; remaining infrastructure complete; hard-country/documentation bottlenecks dominate
Year 5	Residual cohort, catch-up requirement, emergency-law sunset and transition plan

21. The Current Government's Expansion Is a Live Control Group

One strength of assessing Reform in 2026 is that there is an active government expansion programme against which future claims can be compared.

The Home Office is increasing Immigration Enforcement staffing by 60%, expanding detention capacity, increasing returns and operating a new France agreement.

Those measures provide real-world data on recruitment speed, infrastructure delivery and returns productivity.

If Reform claims it can move materially faster, the comparison should be specific: which approval is removed, which construction method is faster, which staffing productivity increases, which country agreement produces the extra removals, and what evidence supports the assumed gain?

That is a more meaningful challenge than assuming the existing government represents either a perfect model or an absolute maximum.

22. The Programme Needs a Benefits-Realisation Dashboard

The most important programme-management improvement Reform could make would be to publish a dashboard separating inputs from completed outcomes.

Inputs include money authorised, beds contracted, jobs advertised, flights reserved and agreements signed.

Operational capacity includes commissioned beds, independently productive staff, executable country routes and removal-ready cases.

Outcomes are completed returns and the fiscal savings actually realised.

Without that hierarchy, a government can announce thousands of “new detention places” that are not yet usable or “five daily flights” that lack viable manifests and still claim implementation is on track.

Level	Example metric
Authorised input	£ allocated; contracts approved; recruitment authorised
Mobilised input	Sites under construction; recruits appointed; agreement signed
Operational capacity	Beds open; staff certified; route/documentation process live
Pipeline output	Removal-ready cases; manifests built; attempts scheduled
Completed outcome	Person leaves UK and is accepted by destination
Benefit realised	Verified avoided expenditure / reduced accommodation or enforcement burden

23. The Programme Also Needs Failure Triggers

A credible critical path includes decisions about what happens when milestones are missed.

If detention construction is six months late, does Reform reduce arrests, use alternative accommodation, expand existing IRCs or procure more sites?

If a major country refuses a return agreement, does the Government reallocate enforcement toward other nationalities or continue detaining the affected cohort?

If recruitment falls short, which function receives priority?

If early removals are below target, at what point does the Government revise the 600,000 figure rather than silently transfer impossible throughput into the final year?

Publishing those triggers would turn the programme from a political target into a governable implementation plan.

NO BASIS FOR THESE SIMPLIFICATIONS

The evidence does not support saying that because the current 1,000-bed Home Office expansion runs to 2030, Reform necessarily needs decades to build 24,000 places; emergency legislation, standardisation and parallel construction could change delivery speed materially. It does not support saying a one-year treaty notice prevents all removals during year one; existing lawful routes continue. Nor does it support Reform's opposite implication that a day-one political decision creates day-one operational capacity. The central uncertainty is the ramp between those two positions.

CONSOLIDATION NOTE — Sections 5.1–5.13 retain their unique evidence, calculations and analysis. Their repeated section-end 'supports / does not support' summaries have been consolidated here into §5.14; the original working summaries are preserved in the Evidence & Sources Compendium.

Policy Feasibility: From Political Promise To Practical Delivery

5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

OVERALL VERDICT

Operation Restoring Justice is not best described as wholly impossible or wholly deliverable. Its individual components fall into different evidential categories. A government with a Commons majority could legislate aggressively, expand enforcement, build detention capacity, recruit staff, charter flights and seek new returns agreements. But Reform's headline outcome — 600,000 removals in five years with a claimed £7 billion first-Parliament saving — depends on all of those components scaling together at unprecedented speed, while several decisive inputs remain outside UK control.

The strongest conclusion from Sections 5.1–5.13 is therefore not "it cannot be done". It is that Reform has not published enough evidence to demonstrate that it can be done on the stated scale, timetable and financial assumptions. The policy currently contains a measurable target without a reproducible delivery model.

1. How This Scorecard Works

This chapter separates political desirability from feasibility. A policy can be legally possible but operationally weak; expensive but achievable; or administratively straightforward while depending on another country's consent. The ratings below therefore assess the evidence required to turn Reform's political commitment into a deliverable government programme.

Rating	Meaning
DEMONSTRATED	The mechanism already exists or the claimed capability is supported by current operational evidence.
FEASIBLE IN PRINCIPLE	Government possesses a credible legal/administrative route, but Reform would still need to implement and scale it.
PLAUSIBLE BUT UNPROVEN	The proposal may work, but Reform has not published enough operational evidence to demonstrate the claimed scale or timetable.
EXTERNALLY DEPENDENT	Success materially depends on actors the UK Government cannot command, particularly foreign states.

Rating	Meaning
INTERNALLY INCOMPLETE	The headline promise lacks an indispensable published component such as staffing, throughput, costing or sequencing.
LEGALLY CONSTRAINED	Domestic legislation can change much of the framework, but residual domestic/international legal limits remain.
UNSUPPORTED AS STATED	Available evidence does not presently substantiate the numerical or causal claim in the form Reform presents it.

2. The Top-Line Scorecard

Policy component	Assessment	Why
Pass a Mass Deportation Bill	FEASIBLE IN PRINCIPLE	A Commons majority could enact extensive immigration legislation. Drafting, Lords scrutiny, commencement and litigation remain relevant.
Repeal the Human Rights Act	FEASIBLE IN PRINCIPLE	Parliament can repeal it. Repeal does not itself terminate the ECHR or every common-law/international protection.
Leave the ECHR	FEASIBLE IN PRINCIPLE	Article 58 provides a lawful withdrawal route, subject to six months' notice.
Withdraw from Refugee Convention / CAT	FEASIBLE IN PRINCIPLE	Denunciation mechanisms exist, but each carries a one-year notice period and withdrawal does not erase every residual protection.

Policy component	Assessment	Why
Identify a much larger removable cohort	PLAUSIBLE BUT UNPROVEN	Government holds extensive data, but matching accuracy, status changes and fragmented systems create false-positive and completeness risks.
Create 24,000 detention places	PLAUSIBLE BUT UNPROVEN	Secure capacity can be built, but Reform has not published sites, programme schedule, procurement plan, workforce establishment or commissioning sequence.
Detain at mass scale	LEGALLY CONSTRAINED	Parliament can alter detention law substantially, but factual removability, residual public law and international obligations remain material.
Recruit the required workforce	PLAUSIBLE BUT UNPROVEN	Recruitment is possible; the missing evidence is role-by-role establishment, vetting/training throughput, productivity and attrition.
Operate up to five deportation flights daily	FEASIBLE IN PRINCIPLE	Charter capacity can be bought. Aircraft are useful only when case-ready passengers, escorts and destination permission exist.
Secure enough return agreements	EXTERNALLY DEPENDENT	Foreign sovereign governments decide whether and on what terms they will receive people. Westminster cannot legislate their consent.

Policy component	Assessment	Why
Achieve 120,000 removals per year	INTERNALLY INCOMPLETE	Latest enforced returns are 9,723 a year. Reform has not published the throughput bridge from that baseline to 120,000.
Complete 600,000 removals in five years	UNSUPPORTED AS STATED	No published critical-path model demonstrates how law, beds, staff, documentation, foreign consent and flights reach the required annual ramp.
Save £7bn in first Parliament / £42bn over 10 years	UNSUPPORTED AS STATED	The claimed savings depend on removal volumes, avoided support costs and programme costs that cannot be independently reproduced from a complete published model.
Use emergency procurement to build rapidly	FEASIBLE IN PRINCIPLE	Accelerated routes exist, but current law does not make planned or authority-created urgency an automatic basis for direct award.
Eliminate legal challenge as an operational constraint	UNSUPPORTED AS STATED	Appeal routes can be narrowed, but judicial review, factual risk assessment and residual legal obligations cannot simply be assumed to vanish.

3. What Reform Could Probably Do Quickly

- Introduce and prioritise primary legislation with a strong Commons majority.
- Give formal notice of withdrawal from treaties containing denunciation clauses.
- Increase Immigration Enforcement budgets and recruitment.
- Intensify raids, arrests and existing enforced-return activity using inherited powers and infrastructure.

- Expand voluntary-return incentives and use existing country agreements more aggressively.
- Launch procurement and site-development programmes for additional detention capacity.
- Increase charter-flight and escorting capacity.
- Begin negotiations with multiple destination countries simultaneously.
- Create new Home Office organisational units such as a Deportation Command.
- Legislate for wider data sharing, subject to whatever safeguards Parliament retains.

THE IMPORTANT CONCESSION

A serious audit should acknowledge that a Reform government would not be powerless. Many of the institutional levers it identifies are real. The evidential weakness lies primarily in scale, interaction, timetable and costing — not in the proposition that government can increase enforcement at all.

4. What Reform Cannot Create by Statute Alone

- Foreign-government consent to receive particular people or categories of people.
- Valid passports or emergency travel documents issued by another state.
- Immediate expiry of treaty notice periods.
- Thousands of already trained, vetted and experienced staff.
- Commissioned secure detention centres before they are built and mobilised.
- Accurate identity/status matches merely by joining imperfect databases.
- Removal-ready cases merely by reserving aircraft.
- Clinical, interpreter, legal and escort capacity merely by increasing detention beds.
- Compliance by airlines, foreign airports and destination authorities in every case.
- The disappearance of factual risks such as torture or onward refoulement.

5. The Numerical Claim Is the Weakest Part of the Programme

Reform's policy is unusually precise about its end point: 600,000 removals over five years.

Precision creates an evidential burden. A government programme with a fixed numerical outcome should normally be capable of showing the capacity assumptions that produce it.

The latest Home Office statistics record 9,723 enforced returns in the year ending March 2026. Reform's implied average of 120,000 a year is therefore approximately 12.3 times that enforced-return flow.

That comparison does not prove impossibility. It identifies the size of the productivity and capacity increase Reform must explain.

The report has found no published Reform model allocating the 600,000 across years, nationalities, voluntary versus enforced routes, detention requirements, country agreements, flights, staffing or expected failed-removal rates.

Question needed to reproduce 600,000	Published answer identified?
How many removals in Year 1, Year 2, Year 3, Year 4 and Year 5?	No complete reproducible schedule identified
How many are expected to be voluntary versus enforced?	No complete cohort model identified
Which countries account for the largest removal volumes?	No complete country allocation identified
Which countries have agreed to receive those volumes?	Not for the proposed programme as a whole
How many cases require detention and for how long?	No complete detention-flow model identified
How many trained staff are required by function?	No role-by-role establishment identified
What proportion of attempted removals fail or are cancelled?	No published programme assumption identified
How does five flights per day translate into passenger throughput?	No complete load-factor/case-mix model identified

6. 24,000 Beds Are Capacity, Not Throughput

The detention promise is another example of a stock being presented alongside a flow.

A 24,000-place estate tells us how many people could theoretically be held at once. It does not tell us how many can be removed each year.

Annual throughput depends on average detention duration and the proportion of beds unavailable because of long-stay, medically complex, legally blocked or otherwise unremovable cases.

If destination cooperation slows, bed turnover falls. Building more beds can then increase custody capacity without proportionately increasing removals.

This is why Sections 5.6, 5.8 and 5.10 treat removability as a more fundamental variable than raw detention capacity.

7. Foreign Consent Is the Programme's Hardest External Constraint

> ***Applying the Part V Common Delivery Baseline, this section therefore focuses only on the additional evidence or constraint specific to this test; the shared requirements for legal authority, casework, capacity, transport, receiving-state cooperation and sequencing are not repeated.***

The current UK–France agreement demonstrates that bilateral readmission mechanisms can be negotiated and can scale: 1,087 people had been returned to France under the agreement by 30 June 2026.

It simultaneously demonstrates the need for eligibility, documentation, security processes and an agreed receiving state.

Return agreements are therefore not a peripheral diplomatic task. They are production capacity.

For large cohorts lacking functioning documentation or cooperative governments, foreign policy may determine the practical ceiling on removals regardless of domestic detention or enforcement spending.

8. The Legal Programme Is More Achievable Than the Operational Programme

Parliamentary sovereignty gives a government with a majority considerable ability to rewrite domestic immigration law.

That makes some of Reform's most dramatic legal promises more achievable in formal terms than its operational target.

But Sections 5.9 and 5.10 show why "we will change the law" is not a complete delivery answer. Treaty withdrawal has notice periods; customary and peremptory international norms do not depend entirely on ECHR membership; and ordinary public law does not disappear merely because the Human Rights Act is repealed.

9. Procurement Is Achievable — the Timetable Is the Question

Government already buys detention, escorting, construction, healthcare, facilities-management and security services from private suppliers.

There is therefore no conceptual procurement barrier to purchasing substantially more of those services.

The problem is mobilisation at the proposed scale. The current Immigration Removal Centre Expansion Programme treats 1,000 additional beds as a major infrastructure programme and retains an Amber delivery-confidence rating.

Current Procurement Act guidance also prevents government from assuming that foreseeable urgency created by its own timetable automatically justifies non-competitive direct awards.

Reform could change procurement law or create bespoke emergency powers. Doing so would itself require legislation and would raise value-for-money, transparency and conflict-management questions examined in Section 5.12.

10. Workforce Is Solvable in Theory, Unspecified in Practice

Britain has a large labour market and government can recruit at scale when it is prepared to pay.

Some roles require security vetting, formal training, certification or existing professional accreditation.

The present government's decision to increase Immigration Enforcement workforce numbers by 60% from the 2024 baseline during 2026–27 is evidence that staffing materially affects enforcement output.

Reform's omission is therefore measurable: it has a removal number and a detention number but no published human-resources establishment connecting the two.

11. The Data-Fusion Proposal Could Help — and Could Also Waste Capacity

A better integrated government data environment could genuinely help identify people whose immigration status requires enforcement attention.

The National Audit Office has, however, identified incomplete and inaccurate records and the absence of a unique identifier capable of tracking individuals across relevant systems as existing weaknesses.

At small scale, a false match wastes an officer visit. At mass scale, systematic matching errors can waste thousands of enforcement hours and create wrongful detention risk.

The evidential test is therefore not whether data matching is useful. It is whether Reform has specified accuracy thresholds, human review, correction procedures, auditability and the staffing needed to resolve disputed identities.

12. Five Flights a Day Is an Input Metric

Five charter flights per day sounds like a high-capacity commitment because aircraft are visible and countable.

But an aircraft is downstream of nearly every difficult stage in the system.

It needs passengers who are lawfully removable, documented, accepted by the destination and physically available for departure, plus escorts where required.

An empty or lightly loaded charter does not improve the removal total merely because the aircraft flew.

The relevant performance metric is therefore completed removals per flight and per available seat, not the number of aircraft chartered.

13. The Savings Claim Cannot Be Separated From the Delivery Claim

Reform says Operation Restoring Justice will produce a £7 billion net saving during the first Parliament and £42 billion over ten years.

A net saving is not simply the gross amount currently spent on people who might eventually be removed.

It requires subtracting the full marginal and capital cost of the programme: detention construction and operation, staff, escorts, flights, healthcare, technology, legal work, compensation risk, return incentives, foreign-government agreements and programme administration.

Most importantly, savings occur only when removals actually avoid expenditure. A person detained for an extended period before an unsuccessful removal attempt can cost more in the short term rather than less.

Because the removal ramp itself has not been reproduced, the timing and magnitude of the claimed savings cannot yet be independently reproduced either.

THE COSTING DEPENDENCY

The £7bn/£42bn claim cannot be audited independently of the 600,000-removal claim. If removals occur later, cost more, require larger payments to destination states, or leave more people in long-term detention than assumed, the savings profile changes. The fiscal model and operational model are therefore the same model viewed from two different directions.

14. The Existing System Shows Both Possibility and Constraint

Current government performance is useful because it prevents two opposite analytical errors.

The first error is assuming large increases are impossible. Enforced returns rose to 9,723 in the year ending March 2026, the government has reallocated staff, is increasing the Immigration Enforcement workforce and has created a functioning new return route with France.

The second error is assuming those improvements demonstrate that scaling to 120,000 enforced removals is straightforward. They do not.

The existing system therefore functions as a control group: Reform should be asked to identify precisely which additional legal, staffing, diplomatic or infrastructure intervention produces each further step in throughput.

15. The Policy Contains a Genuine Strategic Insight

Effective returns require enforcement, detention, data, diplomacy, documentation, transport and law to operate together.

Operation Restoring Justice at least recognises many of those components and attempts to place them under a single political objective.

The weakness is that the published policy jumps from identifying the components to asserting the outcome without showing the intermediate capacity calculations.

In programme-management terms, Reform has described much of the architecture but not demonstrated the throughput model.

16. Where the Policy Is Most Vulnerable to Failure

Failure point	Why it matters	Likely consequence
Return agreements underperform	Large cohorts cannot be admitted elsewhere	Detention fills; removal rate plateaus
Travel-document delays	Individual cases cannot board flights	Longer detention; cancelled removals
Estate opens late	Arrest capacity exceeds custody capacity	Enforcement must be rationed or alternative custody found
Recruitment/training lags	Nominal budget cannot become operational output	Lower raids, casework and escort throughput
Data quality is poor	Wrong or stale targets enter enforcement pipeline	Wasted visits, litigation, wrongful detention risk
Legal transition is slower than assumed	Novel powers cannot be used as planned	Early-year ramp falls below target
Procurement mobilises slowly	Beds/services exist on paper but not operationally	Critical-path slippage
Casework quality falls	More decisions require correction/challenge	Backlogs shift into courts/review
Flight capacity exceeds case-ready pipeline	Aircraft cannot be efficiently filled	High unit cost without proportional removals
Early years miss target	Later years inherit arithmetic catch-up	Required mature throughput rises sharply

17. What Would Change the Verdict?

- A published year-by-year removal schedule adding exactly to 600,000.
- A nationality/cohort model showing which people are expected to be removable and to which destinations.
- Signed or advanced return agreements capable of receiving the largest projected cohorts.
- A detention-estate programme identifying sites, bed-opening dates, operators and capital/operating costs.

- A role-by-role workforce establishment with recruitment, vetting, training and attrition assumptions.
- A caseworker productivity model including failed and delayed cases.
- A charter/escort model showing expected passengers per flight and escorted/unescorted proportions.
- A published data architecture with accuracy, human-review and redress controls.
- A complete fiscal model linking each year's removals to programme expenditure and avoided expenditure.
- A critical-path schedule showing dependencies, contingency and the consequences of missed milestones.

THIS VERDICT IS FALSIFIABLE
This assessment is falsifiable. Signed country agreements, credible site programmes, workforce establishments, a year-by-year ramp and a reproducible costing that closes the gaps identified here would justify upgrading components currently rated "plausible but unproven", "internally incomplete" or "unsupported as stated". The purpose of the audit is to test the claim against evidence, not to preserve a negative conclusion.

18. Evidential Verdict by Theme

Theme	Verdict
Political authority	Strong if Reform wins a workable parliamentary majority.
Domestic legislative capacity	Strong: extensive change is feasible in principle.
International legal reset	Partial: withdrawal mechanisms exist, but notice periods and residual obligations remain.
Identification/data	Potentially useful, but current data quality and integration weaknesses make mass accuracy unproven.
Detention infrastructure	Buildable in principle; 24,000-place timetable not demonstrated.
Workforce	Recruitable in principle; establishment and productive ramp not demonstrated.

Theme	Verdict
Flights/escorting	Purchasable in principle; downstream of case readiness and foreign consent.
Foreign-state cooperation	Critical and externally dependent.
120,000 annual removals	Not demonstrated by a published throughput model.
600,000 five-year total	Unsupported as a deliverable total on current published evidence.
£7bn first-Parliament saving	Not independently reproducible without the missing operational/cost model.
£42bn ten-year saving	Likewise dependent on long-run removal, detention and avoided-cost assumptions.
Overall programme	A collection of partly feasible mechanisms attached to an unproven scale-and-timetable claim.

19. The Strongest Fair Criticism

THE REPORT'S CONCLUSION

The strongest evidence-based criticism of Operation Restoring Justice is not that every element is fantasy. It is that Reform has taken several mechanisms that are individually real — legislation, detention, enforcement, bilateral returns, charter flights and data sharing — and presented their simultaneous expansion as though the resulting 600,000-removal outcome follows automatically.

It does not. The missing bridge is a published implementation model showing people, beds, countries, cases, flights, money and time interacting at the required scale.

20. The Questions Reform Would Need to Answer

- Exactly who comprises the 600,000, by immigration status and nationality?
- How many removals occur in each of the five years?
- How many are voluntary and how many enforced?
- Which destination countries account for the largest volumes?
- Which of those countries have agreed, or are expected to agree, to receive them?

- How many detention places open in each year and at which sites?
- What average detention duration is assumed?
- How many people are expected to remain unremovable for more than six or twelve months?
- How many staff are required in each operational function?
- How long does recruitment, vetting, training and certification take?
- How many removal-ready cases are needed to fill five daily flights efficiently?
- What failed-removal and cancelled-flight rate is assumed?
- What is the full capital and operating cost of 24,000 detention places?
- What payments or incentives to foreign governments are included?
- How are legal challenges, compensation and healthcare costs modelled?
- At what point does a missed annual target trigger revision of the five-year total?
- What independent body will publish monthly progress against the assumptions?
- What evidence allows the £7bn and £42bn net-savings claims to be reproduced?

21. Final Evidential Verdict

FEASIBLE COMPONENTS. UNPROVEN SYSTEM. UNSUBSTANTIATED THROUGHPUT.

Operation Restoring Justice contains mechanisms a UK government could genuinely pursue. Parliament can rewrite substantial parts of domestic immigration law. Government can expand detention, enforcement, data sharing, escorting and charter operations. It can seek new bilateral agreements and increase incentives for voluntary return.

But the programme's defining promise is not merely to do more of those things. It is to convert them into 600,000 completed removals in five years while generating a net fiscal saving.

On the public evidence examined in this report, that defining claim has not been demonstrated.

The largest unresolved variable is foreign-state cooperation. The largest domestic implementation challenge is synchronising detention infrastructure, trained workforce, casework and logistics quickly enough to avoid the ramp penalty. The largest evidential omission is the absence of a reproducible year-by-year operational and financial model.

Accordingly, the appropriate verdict is not "impossible". It is: "not substantiated at the scale and timetable claimed."

"Show the model."

That is the simplest test of the entire policy. If Reform can remove 600,000 people, operate 24,000 detention places and save £7 billion in five years, it should be able to publish the assumptions that make those three numbers reconcile.

SOURCE NOTE — Detailed Part V source registers and supplementary research material are available in the Evidence & Sources Compendium. The common delivery baseline, core calculations, legal analysis and section findings remain in the main report.

PART VI
Money And Influence: Mapping Reform UK's Donor Network

6.1 From Donation to Influence: The Evidence Test

PURPOSE OF PART VI

Parts III–V established who funds Reform, how the organisation is controlled, and what its flagship policies would require in government. Part VI now joins those datasets — but under a stricter evidential rule. A donor's business interest overlapping with a Reform policy is not proof that the donor caused the policy. A friendship is not proof of a bargain. A government contract won by a donor-linked company is not proof of preferential treatment.

The task is to identify when separate facts become a defensible chain: money → access → expressed preference or policy contact → policy alignment → commercial opportunity → procurement participation → demonstrable benefit. Each link must be evidenced independently.

PART VI EVIDENTIAL STANDARD — The report distinguishes five propositions: donation, access, association, policy alignment and causal influence. The first four can be established independently where documentary evidence permits. None, alone or in combination, proves a quid pro quo, improper conduct or that a donor caused a policy outcome. Causal influence is attributed only where evidence supports that stronger proposition. This standard applies throughout Part VI.

1. Why This Part Needs a Higher Evidential Bar

Political finance creates legitimate questions about access and influence precisely because large donations can coexist with entirely lawful political support.

The danger for an investigation is symmetrical. It can understate genuine influence by treating every donation as politically meaningless, or overstate it by treating correlation as a secret transaction.

This report will do neither. It will distinguish what a donor believes, what a donor owns, whom a donor can demonstrably access, what Reform proposes, and whether any evidence connects those facts.

Where the evidence stops, the conclusion stops.

THE CORE RULE

Commercial alignment is a lead, not a verdict. Timing is evidence, not causation. Access is relevant, not proof of control. The strongest finding is the one that survives an active attempt to disprove it.

2. The Seven-Link Influence Ladder

Level	Question	What would count as evidence
1 — MONEY	Did the person fund the party, its predecessor, a senior figure or a related political vehicle?	Electoral Commission records, register entries, company accounts, declared gifts/benefits
2 — INTEREST	What financial, ideological or organisational interests can be documented?	Shareholding filings, directorships, company reports, public statements, foundations/campaigns
3 — ACCESS	Can contact with decision-makers be evidenced?	Meetings, travel, correspondence, adviser roles, events, direct testimony, diaries
4 — PREFERENCE	Did the donor advocate a relevant policy or outcome?	Emails, messages, speeches, lobbying records, interviews, submissions
5 — ALIGNMENT	Did Reform adopt a policy that overlaps with that preference or commercial exposure?	Dated manifestos, policy papers, speeches, amendments

Level	Question	What would count as evidence
6 — OPPORTUNITY	Would implementation create a realistic market or regulatory benefit?	Procurement notices, sector analysis, legislation, contract pipelines
7 — BENEFIT / INFLUENCE	Is there evidence the donor or connected interest actually benefited because of political access or influence?	Contract award evidence, decision records, communications, intervention, preferential terms

Levels 1–6 can justify scrutiny. Level 7 is where allegations of improper influence require direct, strong evidence. The report will not infer Level 7 merely because Levels 1, 2 and 5 coexist.

3. Four Different Things Commonly Confused as "Influence"

Phenomenon	What it means	What it does NOT prove
Ideological alignment	A donor supports a party because it already advocates policies the donor likes.	That the donor wrote or purchased the policy.
Access	Money or personal relationships place a donor near senior political figures.	That the politician acted on the donor's instructions.
Agenda influence	A donor successfully encourages attention to an issue or policy.	Corruption or a commercial quid pro quo.
Transactional influence	A political decision is altered in return for money, benefit or advantage.	This requires evidence far beyond donation timing or policy overlap.

4. The Baseline Harborne Funding Record

Christopher Harborne is the clearest stress-test for the method because his financial relationship with Farage's political project is both unusually large and unusually long-running.

Electoral Commission records identify eight donations to the Brexit Party/Reform UK in the final quarter of 2019 totalling £6.525 million: £1 million on 3 October, £2 million on 10 October, £2 million on 14 November, £1.425 million on 9 December, plus four £25,000 donations in December.

In 2025, Harborne returned at much greater scale: £9 million received by Reform on 31 July and £3 million on 12 November.

Those disclosed party donations alone therefore total £18.525 million across the 2019 and 2025 records identified here, before considering political funding outside the party itself.

Separately, the £5 million personal gift to Nigel Farage reported in 2026 is not treated here as a Reform party donation. Its classification and disclosure questions are dealt with separately because collapsing personal and party finance would obscure rather than clarify the evidence.

Date	Recipient / route	Amount	Evidential significance
3 Oct 2019	Brexit Party / Reform UK record	£1,000,000	Large-scale funding begins in the general-election period
10 Oct 2019	Brexit Party / Reform UK record	£2,000,000	Concentration increases
14 Nov 2019	Brexit Party / Reform UK record	£2,000,000	Continued underwriting-scale support
5–12 Dec 2019	Brexit Party / Reform UK records	£1,525,000 total	Includes £1.425m plus four £25k donations
31 Jul 2025	Reform UK	£9,000,000	Record-scale return to party funding
12 Nov 2025	Reform UK	£3,000,000	Further major concentration
2024 gift, reported 2026	Nigel Farage personally	£5,000,000	Separate personal-benefit/disclosure issue; not counted as party donation

5. Concentration Is a Governance Question Even Without Proven Influence

The Electoral Commission's 2025 data show how unusual the scale became. Reform accepted £5.456 million in donations in Q4 2025; Harborne's £3 million November donation alone represented more than half of that quarter's accepted donations.

His £9 million July donation was itself larger than the annual donation income of many political organisations and was followed only months later by another £3 million.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

The relevant democratic risk is dependency even before any transactional influence is demonstrated.

6. The Harborne–QinetiQ Timeline Immediately Tests One Hypothesis

Part V identified Harborne's large shareholding in QinetiQ because Reform's proposed detention/security expansion could create substantial government procurement opportunities.

The chronology is crucial. The first major QinetiQ holding notification identified in this research is dated 30 May 2022: AML Global Ltd, controlled by Harborne, had acquired approximately 7.08% of QinetiQ.

By late July 2022, the holding had grown to 57,905,817 shares — approximately 10.01% — and was transferred from AML Global Ltd to Klear Kite LLC while Harborne remained the sole ultimate beneficial owner and controller.

The holding subsequently rose to 12.63% in January 2025, 13.02% in October 2025, 14.02% in November 2025 and approximately 15% by June 2026.

This chronology is highly relevant because it weakens one version of the "long game" hypothesis: the evidence presently identified does not show Harborne holding his major QinetiQ stake when he bankrolled the Brexit Party in 2019. The disclosed major stake appears in 2022, after Brexit.

That does not make later policy/commercial overlap irrelevant. It changes the question from "was QinetiQ the original reason for funding Brexit?" to the narrower and more defensible question: "after becoming a major QinetiQ shareholder, did Harborne's political funding, access or expressed preferences intersect with policies capable of benefiting sectors in which he had exposure?"

Date	Harborne / Klear Kite QinetiQ position identified	Political-funding context
2019	No major QinetiQ holding identified in the filings reviewed for this chapter	£6.525m disclosed to Brexit Party/Reform in Q4 2019
30 May 2022	AML Global holding ~7.08%	Post-Brexit; Harborne also supported Conservative political interests during this period

Date	Harborne / Klear Kite QinetiQ position identified	Political-funding context
1 Aug 2022 notice	57.9m shares / ~10.01%; moved AML Global → Klear Kite	Harborne remains sole ultimate beneficial owner/controller
21 Jan 2025	~12.63%	Before the £9m and £3m Reform donations later in 2025
13 Oct 2025	~13.02%	Between the July and November 2025 Reform donations
21 Nov 2025	~14.02%	Days after the £3m Reform donation
May–Jun 2026	~15%	Reform now publishing large-scale border, detention and security policies

A USEFUL NEGATIVE FINDING

The timeline currently cuts against the strongest version of the theory that Harborne funded Brexit in 2019 because of an already-existing QinetiQ interest. The major-shareholding evidence located so far begins in 2022. That is exactly why chronology matters: a serious investigation must preserve facts that weaken its hypothesis as carefully as facts that strengthen it.

7. But QinetiQ Remains a Legitimate Prospective Conflict Watch

The negative finding above does not remove the later transparency issue.

QinetiQ is an established UK defence and security contractor with a large government-facing business. Its FY2026 results reported record order intake of £3.573 billion and a £4.8 billion backlog; it had also secured the £1.5 billion Long Term Partnering Agreement extension for UK test and evaluation.

Harborne's controlled holding was approximately 15% by June 2026. A material increase in the value or profitability of QinetiQ can therefore have material economic significance for him as a major shareholder.

Reform's policy agenda includes border command, surveillance, data integration, defence/security expansion and a very large new detention/removal infrastructure market. Some of those areas are

adjacent to QinetiQ's capabilities; adjacency is not evidence that QinetiQ will bid for, win or even seek the relevant work.

The correct investigative response is prospective: monitor procurement, lobbying/contact and contract participation rather than predict a contract as fact.

NO CONTRACT ALLEGATION

No evidence identified for this chapter shows that Reform has promised QinetiQ an immigration, detention or Deportation Command contract; that Harborne has asked Reform to award one; or that QinetiQ has been selected for one. Any future claim of preferential treatment must be tested against procurement evidence, not inferred from share ownership.

8. Access Must Be Mapped Separately From Money

Part III already established why Harborne cannot be treated as a remote cheque-writer. The next stage will reconstruct documented personal and political access to Farage and other decision-makers.

The £5 million personal gift raises a different access question from ordinary party donations because it creates a direct financial relationship between donor and politician.

Recent reporting also matters because Farage has acknowledged discussions about returning to Reform's leadership before the 2024 election, complicating the earlier public explanation that he was outside politics when the gift was received.

9. Policy Alignment Needs a "Before and After" Test

For every major donor, Part VI should ask whether the relevant Reform policy predates the donor relationship.

If a policy existed substantially unchanged before the donor arrived, ideological selection is often a simpler explanation than donor influence.

If a donor publicly advocates a specific change and the party later adopts it, the timing becomes more interesting — but still requires evidence of contact before causation can be inferred.

If the donor acquires a commercial interest only after the policy already exists, the investigation should consider investment opportunity rather than policy purchase.

If funding, access, advocacy, policy change and commercial opportunity all occur in sequence, the evidential case becomes stronger and warrants deeper scrutiny.

10. The Counterfactual Test

A useful question is: would Reform probably hold this policy if the donor did not exist?

For Brexit itself, Farage's Euroscepticism long predates Harborne's 2019 funding. That makes it implausible to claim Harborne created Farage's commitment to leaving the EU.

Harborne's money may still have affected the scale, reach or organisational capacity of the Brexit Party campaign. That is a different and much more defensible proposition from claiming he originated the ideology.

The same distinction will be applied to immigration, crypto regulation, defence, taxation, healthcare, energy and other policy areas.

11. Money Can Buy Capacity Without Buying Policy

One of the most important forms of donor influence is also the least conspiratorial: money changes what a political organisation is capable of doing.

Millions of pounds can fund staff, advertising, data, offices, campaigning, candidate support, events and professional infrastructure even where the donor never requests a policy change.

Harborne's 2019 funding therefore matters independently of any quid pro quo because it helped finance a new political vehicle built around Farage at a critical moment.

His £12 million of disclosed Reform donations in 2025 likewise altered the party's resource position whether or not he influenced a single manifesto sentence.

Part VI will therefore distinguish policy influence from capacity influence.

12. The "Underwriting" Question

Contemporary reporting has described a 2019 message in which Harborne said he had assured Farage that he would underwrite campaign expenses while expressing concern that a single dominant funder would look undesirable.

According to the reporting, an associate did not ultimately make the proposed £50,000 donation and Harborne's representatives have said his political donations complied with electoral law.

The evidential significance is therefore not that an unlawful donation has been established. It is that the reported message, if authentic and accurately contextualised, speaks directly to donor concentration and Harborne's perception of his role in financing the campaign.

That issue should be handled separately from any allegation of policy influence.

13. A Donor Can Have More Than One Motive

Political donations need not reduce to either pure ideology or commercial self-interest.

A donor may simultaneously support Brexit, value personal access, prefer a particular tax regime, oppose regulation, enjoy political involvement and hold investments affected by government decisions.

The existence of a commercial interest therefore does not invalidate ideological motivation; equally, ideological sympathy does not make commercial overlap irrelevant.

The investigation should resist assigning a single motive unless the donor's own communications establish one.

14. The Research Matrix for Every Major Donor

Field	Question to answer
Funding chronology	When, how much, and through which legal/political entity?
Political relationship	When did contact with Farage/Reform begin?
Access evidence	Meetings, travel, adviser roles, messages, events, personal gifts?
Business interests	Companies, sectors, major shareholdings, government contracts?
Ideological interests	Public campaigning, think tanks, speeches, causes?
Policy chronology	When did Reform first adopt the relevant policy?
Policy change	Did the policy materially change after donor involvement?
Commercial exposure	Could the policy plausibly affect the donor's assets or businesses?
Direct advocacy	Did the donor ask for, recommend or lobby for the policy?
Benefit evidence	Did a connected interest actually receive a contract, regulatory advantage or other measurable benefit?
Alternative explanation	What facts support coincidence, pre-existing ideology or ordinary investment?
Verdict	Coincidence / alignment / access concern / influence evidence / unresolved

15. The Standard of Language

Evidence position	Permitted wording
Money + commercial overlap only	“raises a legitimate transparency question”; “creates a potential conflict to monitor”
Money + access + policy overlap	“warrants scrutiny”; “creates a plausible influence pathway”
Documented donor advocacy + later policy adoption	“evidence of attempted/possible agenda influence”, subject to chronology and context
Direct communication tying money/access to decision	“evidence linking funding/access to the policy decision”
No direct bridge	Do not use “bought”, “bribe”, “payback”, “rewarded with a contract” or equivalent as factual conclusions

16. Preliminary Harborne Verdict

CURRENT POSITION — BEFORE THE FULL CHRONOLOGY

Harborne is demonstrably an exceptionally large financier of Farage’s political project and has a direct personal financial relationship with Farage through the reported £5 million gift. He is also demonstrably the ultimate controlling person behind a roughly 15% QinetiQ holding by June 2026. Those facts justify unusually close scrutiny of access, policy alignment and future procurement.

They do not currently demonstrate that Harborne funded Brexit to create a future security market, that Reform’s deportation policy was designed for QinetiQ, or that QinetiQ will receive Reform contracts. The QinetiQ major-shareholding chronology located so far begins in 2022, which materially weakens the most ambitious “long game” version of that theory.

17. Why This Makes the Investigation Stronger, Not Weaker

An investigation gains credibility when it records evidence that cuts against its own suspicion.

The fact that Harborne’s major QinetiQ stake appears after Brexit prevents us from building a seductive but unsupported narrative around 2019.

It also sharpens the later question. By 2025–26, Harborne had both dramatically increased his Reform funding and increased his QinetiQ holding. That later overlap is real and dateable.

The relevant evidential period is therefore the one in which money, access, shareholding and Reform's developing policy platform genuinely coexist — without pretending they coexisted earlier.

18. The Questions for 6.2

- When exactly did Harborne's relationship with Farage begin, and how did it develop?
- What did Harborne say privately or publicly about Brexit and his reasons for funding the Brexit Party?
- What access did the 2019 funding produce, if any?
- What happened between the end of the Brexit campaign and his first disclosed major QinetiQ stake in May 2022?
- How did his QinetiQ holding change between 2022 and 2026?
- When did Reform's defence, border-security, surveillance, detention and procurement policies take their current form?
- What is the exact chronology of the £5 million Farage gift and Farage's discussions about returning to frontline politics?
- What access to Farage, Tice, Cottrell or other Reform figures can be independently documented?
- Did Harborne ever advocate a policy relevant to QinetiQ, crypto, aviation, defence or government procurement?
- Can any Reform policy change be dated after such advocacy?
- Is there evidence of QinetiQ lobbying, meetings or procurement contact involving Reform figures?
- What evidence would disprove the hypothesis of commercial influence?

Money And Influence: Mapping Reform UK's Donor Network

6.2 Christopher Harborne: The Chronology Test

RESEARCH QUESTION

Does the dated public record support a coherent inference that Christopher Harborne's political funding was intended to shape Reform policy for his commercial benefit — or does the chronology better support a mixture of long-standing ideological alignment, political access, investment activity and later commercial-policy overlap?

The result is mixed but clarifying. Harborne's support for Farage predates his disclosed major QinetiQ holding, substantially weakening the theory that defence/security procurement explains his original Brexit Party funding. However, by 2024–26 several different relationships overlap at once: a major QinetiQ position, substantial crypto interests, a £5 million personal transfer to Farage, renewed mega-donations to Reform, and Reform policies with implications for crypto, defence, borders and government security procurement. That later period warrants close scrutiny — but the public record examined here still lacks the direct evidential bridge needed to infer a quid pro quo.

1. The Chronology in One View

Period	Harborne / Farage / Reform event	Commercial / policy context	What it proves
2019	Harborne becomes a dominant Brexit Party funder during the European/general-election period.	Brexit is already Farage's defining political project.	Large-scale capacity funding; not proof Harborne originated Brexit policy.
2020	Harborne and Farage are publicly photographed together at lunch in London.	Brexit transition period.	Relationship is not merely anonymous donor-to-party.

Period	Harborne / Farage / Reform event	Commercial / policy context	What it proves
2021	Public reporting identifies Harborne as an investor/shareholder in the Tether/Bitfinex corporate ecosystem.	Crypto regulation becomes increasingly politically salient.	Commercial exposure relevant to later crypto-policy analysis.
May–Aug 2022	First major QinetiQ holding notices located: ~7.08%, rising to ~10.01%.	QinetiQ is an established MOD-facing defence/security contractor.	Major defence-company exposure appears after 2019 Brexit funding.
2022–23	Harborne supports Conservative political interests and gives £1m to Boris Johnson's private office.	Shows political finance is not confined exclusively to Farage/Reform.	Important alternative explanation: broader ideological/network activity.
2023	Harborne accompanies Johnson on a Ukraine trip in later-reported records.	QinetiQ and other defence interests make access noteworthy.	Access/network evidence; not proof of contract influence.
Mar–Apr 2024	Farage reportedly discusses conditions/liabilities around returning to Reform leadership; Harborne's lawyers date the £5m gift to 5 April.	Farage later says gift was unconditional/security-related and also describes it as a Brexit reward.	The gift chronology overlaps with political-return discussions and merits scrutiny.
3 Jun 2024	Farage announces he will stand in Clacton and retakes Reform leadership.	General election campaign begins for Farage.	Political return follows the reported gift by weeks.

Period	Harborne / Farage / Reform event	Commercial / policy context	What it proves
Jan 2025	Klear Kite / Harborne QinetiQ holding reaches ~12.63%.	Defence/security exposure is now substantial.	Commercial interest clearly established before 2025 Reform mega-donations.
31 Jul 2025	Harborne gives Reform £9m.	Reform is building national campaign capacity and policy infrastructure.	Extraordinary funding concentration.
Oct–Nov 2025	QinetiQ stake rises ~13.02% then ~14.02%; Harborne gives Reform another £3m on 12 Nov.	Policy and commercial timelines increasingly overlap.	Scrutiny justified; causation still unproved.
2026	QinetiQ holding reaches ~15%; Reform advances large border, detention, security and defence proposals; £5m gift becomes public and subject to scrutiny.	Potential government-procurement opportunity exists if Reform enters office.	Prospective conflict/transparency watch; no contract evidence.

2. 2019: Funding an Existing Political Project

The starting point matters because Farage's commitment to leaving the European Union long predates Christopher Harborne's large-scale funding.

Harborne's 2019 donations therefore cannot sensibly be treated as evidence that he created Farage's Brexit position. The more defensible inference is that a wealthy supporter financed a political vehicle already committed to an outcome he favoured.

Electoral Commission records reviewed earlier in this report show £6.525 million in Harborne donations during Q4 2019 alone. Other reporting covering a wider 2019–20 period places his overall Brexit Party/Reform support higher.

The distinction between "buying a policy" and "buying capacity" is essential. Millions of pounds could materially increase campaign reach, staffing, advertising and organisational resilience even if Harborne never asked Farage to alter a policy.

FIRST COUNTERFACTUAL

Would Nigel Farage have advocated Brexit without Christopher Harborne? The historical record makes the answer overwhelmingly yes. Harborne's plausible influence in 2019 is therefore primarily about political capacity and access, not the creation of the underlying Brexit objective.

3. The 2019 Underwriting Message: Important, but Easy to Overstate

Financial Times reporting later described a 2019 message in which Harborne said he had assured Farage that he would underwrite campaign expenses while discussing concern about the appearance of one dominant donor and a possible £50,000 donation by an associate.

The contemplated associate donation was not ultimately made, and Harborne/Reform have maintained that the donations complied with electoral law.

The message is nevertheless relevant to the chronology because it suggests Harborne viewed himself not simply as one contributor among many but as someone capable of underwriting campaign expenditure.

That is evidence about financial role and concentration. It is not, by itself, evidence that Farage promised Harborne a policy or commercial benefit.

4. 2020: Evidence of a Continuing Personal Relationship

The donor relationship did not simply vanish after the 2019 election. Harborne and Farage were photographed together at a London lunch in July 2020.

One photograph cannot tell us what was discussed. It does establish that the relationship included direct personal contact after the election campaign.

This matters later because access is cumulative: a long-standing donor who also has a personal relationship occupies a different evidential position from a donor who has never met the politician.

5. Crypto Exposure Predates the Later Reform Crypto Debate

Harborne's wealth is significantly connected to cryptocurrency. Public reporting has identified him as a substantial investor in the corporate ecosystem around Tether and Bitfinex; later reporting describes a roughly 12% Tether interest as well as a Bitfinex stake.

That exposure matters because crypto regulation can materially affect businesses and investors in the sector.

But the same evidential discipline applies here as with QinetiQ. A crypto investor donating to a party that later adopts pro-crypto positions creates a policy-alignment question, not automatic proof that the donor dictated those positions.

The next donor-policy chapters should therefore date Reform/Farage crypto statements against Harborne's funding and any evidence of direct advocacy.

6. 2022: The QinetiQ Hypothesis Changes

The first major QinetiQ shareholding notification located in this investigation is dated 30 May 2022. AML Global Ltd, controlled by Harborne, crossed to approximately 7.08%.

By August 2022 the holding was approximately 10.01%, with 57.9 million shares transferred from AML Global to Klear Kite LLC while Harborne remained the sole ultimate beneficial owner and controller.

This is the decisive chronology point for the strongest "Brexit was a long game for QinetiQ" theory: the disclosed major QinetiQ interest appears around three years after Harborne's major 2019 Brexit Party funding.

There may have been smaller or indirect exposure before the disclosure threshold; the filings reviewed here do not establish one. The report therefore cannot claim that no QinetiQ interest of any kind existed before 2022. It can say that the major holding we can document begins in 2022.

That difference should remain explicit throughout the report.

HYPOTHESIS UPDATE

Original hypothesis: Harborne funded Brexit in 2019 as part of a long-term plan connected to QinetiQ/security procurement.

Current evidential position: weakened. The documented major QinetiQ stake appears in 2022. The stronger surviving hypothesis concerns the later period: once Harborne had substantial defence/security exposure, did his renewed funding and access intersect with Reform policies in ways that produced influence or commercial opportunity?

7. 2022–23: Harborne's Political Network Extends Beyond Reform

Harborne also gave substantial support to Conservative political interests, including £1 million to the private Office of Boris Johnson after Johnson left Downing Street.

This is an important alternative-explanation fact. It suggests Harborne's political financing cannot be understood solely as an exclusive commercial arrangement with Farage.

It may instead reflect broader ideological affinity, support for Brexit-aligned political figures, personal relationships, strategic networking — or some mixture of these motives.

The existence of multiple political beneficiaries weakens simplistic claims that every Harborne payment is uniquely tied to Reform policy. It simultaneously broadens the access network that should be mapped.

8. The Johnson–Ukraine Episode Shows Why Access and Interest Must Be Kept Separate

Later reporting based on leaked records said Harborne accompanied Boris Johnson on a September 2023 visit to Ukraine and was registered by organisers as an adviser to the Office of Boris Johnson.

Given Harborne's defence-sector investments, that juxtaposition naturally attracts scrutiny.

Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.

The same standard must apply when examining his relationship with Farage.

9. March–April 2024: The Most Sensitive Part of the Timeline

The £5 million personal transfer to Farage is the most consequential event in the chronology because it sits outside ordinary party finance and creates a direct financial relationship between donor and politician.

Harborne's lawyers have said the gift was made on 5 April 2024. Reporting in July 2026 said Farage had told senior Reform figures in March 2024 that returning to frontline politics would require roughly £1 million a year to replace lost earnings.

Farage subsequently acknowledged in August 2026 that he had discussed returning to Reform leadership in the spring of 2024, earlier than his previous public account suggested.

Some reporting also says parts of the £5 million were received later, including near the end of May, shortly before Farage's 3 June announcement that he would stand in Clacton and resume the leadership.

Farage and Harborne have denied that the payment was political consideration. Harborne's representatives have said he expected nothing in return and did not envisage Farage returning to politics; Farage has described the payment as unconditional, connected to security, and separately as a reward for his Brexit campaigning.

Those explanations are not identical. The evidential task is not to choose the most suspicious interpretation automatically, but to establish the payment schedule, contemporaneous communications and what each man knew about Farage's possible return at the time.

THE APRIL 2024 QUESTION

The key issue is not merely "why did Harborne give Farage £5m?" It is: what discussions about Farage's political future had occurred before each tranche was agreed or paid, who knew about those discussions, and was the payment connected in any way to the cost of returning to frontline politics? Public reporting raises that question; it does not yet supply a definitive answer.

10. June 2024: The Political Return

On 3 June 2024 Farage reversed his earlier position, announced he would stand in Clacton and returned as Reform leader.

Temporal proximity to the reported gift is evidentially relevant but not sufficient to prove causation.

The chronology becomes more significant because Farage has since acknowledged spring discussions about the liabilities associated with returning, while the payment was made during that same broad period.

This is one of the clearest places where primary evidence — bank dates, messages, meeting notes and testimony — could materially change the assessment.

11. 2025: Commercial Exposure and Political Funding Now Clearly Coexist

By January 2025 Klear Kite's QinetiQ holding was approximately 12.63%.

On 31 July 2025 Harborne made a £9 million donation to Reform, followed by a further £3 million received on 12 November.

During the same year his QinetiQ holding increased again, crossing approximately 13.02% in October and 14.02% in November.

Unlike the 2019 position, there is now no chronology problem in saying that major Reform funding and a major QinetiQ interest coexist. They plainly do.

The remaining question is the missing bridge: did Harborne advocate policies relevant to QinetiQ or did Reform alter policies because of him? No such bridge has been established in the evidence assembled for this chapter.

12. 2025–26: QinetiQ Is a Material Government Contractor

QinetiQ's relevance is not speculative in the sense of whether it does major government work. In May 2025 the Ministry of Defence announced a five-year £1.5 billion extension covering test, trial, training and evaluation at 16 MOD sites.

QinetiQ's FY2026 results reported record order intake of £3.573 billion and a £4.8 billion backlog.

By June 2026 Harborne/Klear Kite controlled approximately 15% of QinetiQ voting rights according to the major-shareholding notification.

This establishes a material economic interest in a company deeply embedded in UK defence procurement.

13. Reform's 2025–26 Policy Platform Creates Areas to Monitor

Part V documented Reform proposals involving border command, surveillance/data integration, detention construction, security, aviation/escorting and a much larger enforcement apparatus.

Separately, Reform has promoted a broader pro-crypto political identity, another area relevant to Harborne's commercial exposure.

These policy areas should now be divided into three categories: direct sector relevance, adjacent capability and merely thematic overlap.

QinetiQ's defence/test/security business makes some national-security procurement directly relevant, while immigration-detention operation is currently more clearly associated with incumbents such as Mitie and Serco.

Crypto policy may be commercially relevant to Harborne without involving QinetiQ at all.

Combining every Harborne interest into one theory would therefore make the investigation weaker. Each policy intersection needs its own evidence chain.

14. 2026: The £5m Gift Becomes a Live Standards Matter

The Parliamentary Commissioner for Standards opened an investigation into Nigel Farage on 13 May 2026 concerning an alleged failure to register an interest.

Parliament's current investigations page records that investigation as suspended on 8 July 2026 under the procedural protocol.

A suspension does not itself determine guilt or innocence and the Commissioner does not publish detailed commentary while matters are live.

The existence of the inquiry is nevertheless relevant to the chronology because the direct Harborne–Farage financial relationship is now subject to formal institutional scrutiny rather than only media questioning.

15. What the Chronology Supports

- Harborne has provided unusually large and repeated financial support to Farage's political vehicles.
- The relationship includes demonstrable personal access rather than only anonymous or arm's-length donations.
- Harborne has substantial commercial interests in crypto and, from at least 2022 at major-disclosure level, QinetiQ.
- The £5 million personal gift occurred during a period in which Farage was discussing the possibility and financial implications of returning to Reform leadership, according to later reporting and Farage's own subsequent acknowledgement of spring discussions.
- By 2025–26 major Reform donations, a growing QinetiQ stake and Reform policies touching security/defence/borders coexist chronologically.
- These facts justify detailed scrutiny of access, advocacy, policy development and future procurement.

16. What the Chronology Does Not Support

- It does not establish that Harborne caused Farage to support Brexit.
- It does not establish that a major QinetiQ interest existed when Harborne made his 2019 Brexit Party donations.
- It does not establish that Brexit was engineered to create a future detention or security market.
- It does not establish that the £5 million gift caused Farage to return to politics.
- It does not establish that Harborne dictated Reform's immigration, defence or crypto policies.
- It does not establish that QinetiQ has been promised, sought or will receive contracts under a Reform government.
- It does not establish corruption, bribery or a quid pro quo.

17. The Strongest Alternative Explanations

Alternative explanation	Evidence consistent with it	What would weaken it
Ideological Brexit alignment	Farage's Brexit position predates Harborne; Harborne funded Brexit-aligned figures.	Private communications showing funding conditional on specific commercial outcomes.
Political-network patronage	Harborne funded both Farage/Reform and Boris Johnson interests.	Evidence that payments were tied to a specific Reform-only decision.
Ordinary investment strategy	QinetiQ stake appears years after 2019 Brexit funding and increases over time.	Evidence investment decisions were coordinated with privileged knowledge of Reform policy/procurement.
Personal friendship/access	Long-running direct contact and major personal gift.	Evidence the relationship was purely transactional or conditional.
Mixed motives	Ideology, access, crypto, defence and political interest can coexist.	Clear contemporaneous statement identifying a single dominant quid-pro-quo motive.

18. The Evidence That Would Move This From "Scrutiny" to "Influence"

- Messages or emails in which Harborne asks Farage/Reform for a policy change relevant to his interests.
- Meeting records showing QinetiQ, crypto regulation or procurement discussed with Reform decision-makers.
- A dated Reform policy shift following such advocacy that cannot readily be explained by pre-existing party policy.
- Internal documents identifying Harborne as a policy stakeholder or adviser.
- QinetiQ lobbying or bid preparation involving Reform figures before a procurement process.
- Evidence that the £5 million gift was discussed as financing Farage's political return rather than as an unconditional personal gift.
- Contract or regulatory decisions accompanied by interventions from Farage/Reform on Harborne's or a connected company's behalf.
- Preferential procurement treatment that cannot be explained by ordinary competitive criteria.

19. The Evidence That Would Weaken the Influence Hypothesis

- Contemporaneous evidence that Harborne had no knowledge of Farage's return discussions when the £5 million was committed and paid.
- Documentation showing the gift purpose and payment schedule were fixed before political-return discussions began.
- Policy drafts showing Reform's relevant security, crypto or border positions were settled before Harborne's renewed involvement.
- Evidence that Harborne explicitly avoided policy discussions with Reform figures.
- Procurement records showing donor-linked companies were treated identically to competitors or did not participate.
- Investment records demonstrating QinetiQ accumulation followed an independent long-term investment thesis unrelated to Reform.
- Evidence that the relevant policy would produce no distinctive benefit for Harborne compared with the wider sector.

THE INVESTIGATIVE VERDICT

The chronology does not validate the "cause the problem, then profit from fixing it" theory. In its strongest QinetiQ form, it currently cuts against it because the documented major QinetiQ holding appears after Brexit. What the chronology does reveal is a later and narrower transparency problem: from 2024 onward, extraordinary personal and party funding, direct access, substantial crypto/defence interests and Reform's developing policy platform increasingly overlap.

That overlap is sufficient to justify forensic scrutiny. It is not sufficient to allege a bargain.

20. The Most Important Unresolved Window: March–June 2024

If Part VI ultimately finds a direct influence pathway, the spring 2024 period may be the most consequential place to look.

The central events are unusually compressed: discussions about Farage's possible return and financial liabilities; the reported 5 April Harborne gift date; possible later tranches; negotiations involving Tice/Cottrell reported elsewhere in this investigation; and Farage's 3 June return as leader and candidate.

Those events also intersect with the separate related-party finance issues examined in Section 3.3.

The next evidential priority should therefore be to align the Harborne gift chronology with the Tice/Cottrell leadership-negotiation and loan-repayment chronology on a single day-by-day timeline.

Money And Influence: Mapping Reform UK's Donor Network

6.3 Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?

THE FINDING

Crypto produces a stronger influence pathway than QinetiQ — because here the public record contains not only money, commercial interest and policy overlap, but documented political advocacy on issues capable of affecting Harborne's sector. Farage launched an unusually detailed pro-crypto package in May 2025; later pressed the Governor of the Bank of England privately on cryptocurrency regulation, stablecoin limits and the proposed digital pound; and publicly championed stablecoins after Harborne's record Reform donation.

That is evidence of lobbying by Farage on crypto policy. It is not yet evidence that Harborne instructed him to do it. The crucial missing link remains donor → request/instruction → Farage intervention.

1. Why Crypto Is Different From the QinetiQ Hypothesis

The QinetiQ investigation found commercial-policy adjacency but no evidence that Farage had intervened with a regulator or government body on a QinetiQ-specific issue.

Crypto is different. Farage has personally advocated specific regulatory outcomes, including in a private meeting with Bank of England Governor Andrew Bailey.

Harborne is not merely a casual crypto investor. Court records and later reporting identify him as a minority owner of approximately 12% of Bitfinex and its sister company Tether, while Harborne himself has publicly supported UK cryptocurrency regulation.

Tether issues the world's dominant dollar-linked stablecoin. Rules affecting private stablecoins and a competing central-bank digital currency are therefore potentially economically relevant to the sector in which Harborne holds a substantial stake.

This moves the evidence further up the influence ladder established in Section 6.1: MONEY + INTEREST + ACCESS + POLICY ALIGNMENT + POLITICAL ADVOCACY are all present. What remains unproved is whether Harborne caused or directed that advocacy.

2. Harborne's Crypto Interest Is Independently Documented

A Delaware court opinion in Harborne's litigation against Dow Jones records that he owned 12% of Bitfinex and its sister company Tether and describes him as a minority stakeholder rather than an executive.

Harborne's lawyers and public statements have likewise stressed that distinction: ownership does not make him responsible for Tether's management decisions.

That caveat matters. The relevant question for this report is financial exposure and policy interest, not operational control of Tether.

By March 2026 Harborne told the Guardian that he believed cryptocurrency should be regulated in the UK. The same report records his 12% Tether interest and Bitfinex stake.

EVIDENTIAL DISTINCTION
"Harborne owns a material minority stake in Tether/Bitfinex" is supported. "Harborne controls Tether" is not supported by the evidence reviewed here. These are materially different propositions and should not be conflated.

3. Harborne Has His Own History of Crypto Policy Engagement

The public record also weakens any suggestion that Harborne is simply a passive investor with no interest in regulation.

Reporting based on EU transparency records identifies Harborne as registered in 2020–21 as a lobbyist for the Digital Currencies Governance Group (DCGG), which sought to influence European crypto policy.

Those records reportedly include a meeting with staff of a Czech Pirate Party MEP.

Harborne's lawyers have emphasised that there is no evidence his DCGG activity was undertaken for or on behalf of Tether.

That limitation is important, but the records still establish a personal history of engagement with cryptocurrency public policy before Reform's 2025 crypto package.

4. Farage's Opposition to Central-Bank Digital Currency Predates the £5m Gift

Reform has responded to the later controversy by pointing out that Farage's opposition to central-bank digital currencies dates to early 2021.

That is a significant counterfactual. If Farage publicly opposed CBDCs years before the April 2024 Harborne gift, the gift cannot reasonably be presented as the origin of that belief.

The correct question is narrower: did the later donor relationship intensify, operationalise or redirect Farage's pre-existing position into advocacy on specific regulatory choices that also mattered to Harborne's investments?

This distinction between origin and amplification is central to a fair assessment.

SECOND COUNTERFACTUAL

Would Farage have opposed a digital pound without Harborne? The available chronology strongly suggests yes. The potentially more significant issue is whether his later access to policymakers and advocacy on stablecoin-specific rules reflected only his own long-held beliefs or also aligned with the interests of his principal financier.

5. 29 May 2025: Reform Launches an Unusually Specific Crypto Package

At the Bitcoin 2025 conference in Las Vegas, Farage announced that Reform would accept cryptocurrency donations and unveiled plans for a Cryptoassets and Digital Finance Bill.

The announced package went well beyond generic support for innovation. It proposed cutting capital gains tax on cryptoassets from 24% to 10%, establishing a bitcoin digital reserve at the Bank of England, and protecting crypto users from banking restrictions or "debanking".

Farage described the objective as turning the UK into a crypto powerhouse.

These are concrete policy choices capable of affecting the attractiveness, taxation and institutional adoption of digital assets.

The policy was announced before Harborne's £9 million Reform donation received on 31 July 2025, but after the reported £5 million personal gift made in 2024 and against the background of Harborne's long-established crypto wealth.

Policy announced May 2025	Potential sector effect	Harborne relevance
Crypto CGT cut: 24% → 10%	Reduces tax burden on taxable UK crypto gains and may encourage trading/investment	Potentially favourable to crypto holders generally; individual Harborne tax benefit depends on residence, tax status and transactions

Policy announced May 2025	Potential sector effect	Harborne relevance
Bitcoin reserve at Bank of England	Creates sovereign institutional demand/legitimacy for bitcoin	Sector-wide crypto benefit; not specifically a Tether policy
Anti-debanking protections	Could improve banking access for crypto users/businesses	Potential sector benefit
Accept crypto political donations	Creates new political-finance channel	Directly relevant to Reform fundraising, subject to donor verification rules
UK “crypto powerhouse” strategy	More permissive/adoption-oriented policy environment	Broadly aligned with interests of major crypto investors

6. Timing Cuts Both Ways

The May 2025 bill predates Harborne’s £9 million and £3 million Reform donations later that year. That makes it inaccurate to imply those two party donations purchased the original crypto package.

However, the policy postdates the £5 million personal gift to Farage in April 2024 and Harborne’s long-running relationship with him.

The chronology therefore neither proves independence nor proves influence.

It identifies the evidence we would need: who drafted the bill, who was consulted, whether Harborne or his associates reviewed it, and whether any proposals originated in communications with him or organisations with which he was connected.

7. The Most Commercially Sensitive Issue Is Not Bitcoin — It Is Stablecoins and the Digital Pound

Tether’s principal product is a private stablecoin rather than bitcoin. That makes Reform’s bitcoin reserve proposal politically conspicuous but not necessarily the most relevant policy to Harborne’s Tether exposure.

The more direct intersection is the future relationship between private stablecoins and a potential Bank of England digital pound.

An industry group representing crypto stakeholders including Tether had previously argued to the Bank and Treasury that a central-bank digital currency could draw users away from private stablecoins and that the authorities should instead support a regulated private-stablecoin market.

Farage later adopted an intensely hostile public position toward a UK central-bank digital currency.

The alignment is therefore substantive: both Farage and industry advocates associated with Tether opposed a policy that they believed could disadvantage private stablecoins.

8. September 2025: Farage Takes the Argument Inside the Bank of England

The evidence becomes stronger at this point because the activity moves from manifesto rhetoric to direct institutional advocacy.

Andrew Bailey later confirmed that the September 2025 meeting with Farage and Richard Tice was arranged at Tice's request following an exchange of letters.

Bailey confirmed that Farage made his views on UK cryptocurrency regulation and the Bank's digital-currency proposal "very clear".

Farage has said he asked Bailey directly whether the Bank was continuing with a British central-bank digital currency and pressed him over proposed restrictions on stablecoin holdings.

This is appropriately described as lobbying in the ordinary policy sense: a political leader sought to persuade an independent public institution to alter policy.

THE STRONGEST FACT SO FAR

Farage did not merely publish a pro-crypto manifesto. He and Tice obtained a private meeting with the Governor of the Bank of England and Farage advocated regulatory positions that overlapped with the commercial environment of private stablecoins — a sector in which his principal donor held a substantial investment.

That is a real influence pathway. The missing evidence is whether Harborne requested, encouraged, briefed or otherwise caused Farage's intervention.

9. The £9m Donation Precedes the Bank Meeting

Chronology now becomes particularly important.

Harborne's £9 million Reform donation was received on 31 July 2025.

The private Bank of England meeting took place in September 2025.

Farage then publicly described his discussions with Bailey at crypto events and continued to attack the digital-pound proposal.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

That makes disclosure of any communications between Harborne, Farage, Tice and crypto-policy advisers during this period particularly important.

10. Farage Also Pressed the Bank on Stablecoin Holding Limits

Farage has said that he urged Bailey to abandon a proposed cap on the amount of stablecoins individuals could hold.

The Bank subsequently moved away from the originally proposed cap after consultation and considered other mechanisms for addressing risks.

Farage claimed credit for changing Bailey's position.

Bailey later expressly stated that no policy changes had taken place as a result of Farage's interventions.

This creates an unusually useful evidential control: Farage demonstrably attempted influence; the Governor says the attempt did not cause policy change.

ATTEMPTED INFLUENCE ≠ SUCCESSFUL INFLUENCE

This is one of the cleanest distinctions in the report. The Bank meeting supplies evidence that Farage attempted to influence crypto policy. Bailey's written response supplies evidence against the claim that Farage successfully changed Bank policy. Both facts belong in the record.

11. Farage Publicly Promotes Stablecoins After the Harborne Donation

In September 2025, after Harborne's record £9 million donation, Farage publicly argued that London should embrace stablecoins and crypto and become a global trading centre for the sector.

That statement is plainly aligned with the economic interests of the private-stablecoin industry.

It is also consistent with Farage's broader libertarian and deregulatory political positioning and therefore cannot be attributed to Harborne merely from timing.

The evidential question remains whether there was donor-specific communication behind the advocacy.

12. Harborne Has Publicly Denied Asking for Policy in Return

Harborne has said that Farage was correct to state that he asked for nothing in return for his donations.

He has separately stated that cryptocurrency should be regulated in the UK.

Those statements matter and should be included alongside the circumstantial evidence rather than omitted because they weaken an influence theory.

13. The Digital Pound Could Matter to Tether — But the Size of Any Harborne Benefit Is Uncertain

Industry submissions have argued that a central-bank digital currency could reduce demand for private stablecoins. If that assessment is correct, blocking or limiting a digital pound could be favourable to incumbent private stablecoin issuers.

Harborne's approximately 12% minority stake gives him a clear economic interest in Tether's success.

However, quantifying the effect of UK digital-pound policy on Tether's global profits is highly uncertain. Tether operates internationally and UK demand is only one part of its market.

Claims that a particular Bank policy would personally cost or benefit Harborne by a precise sum should therefore be treated cautiously unless supported by a robust financial model.

14. The Crypto-Donation Policy Creates a Separate Political-Finance Issue

Reform became the first major UK political party to announce that it would accept cryptocurrency donations, subject to donor eligibility and Electoral Commission rules.

The Electoral Commission later clarified that cryptoassets are property and that reportable cryptoasset donations must be treated as non-monetary donations under existing political-finance law.

In March 2026 the government announced plans for a moratorium on crypto political donations until Parliament and the Electoral Commission are satisfied that regulation provides sufficient transparency.

This does not make Reform's earlier acceptance unlawful. It shows that crypto political finance became a live regulatory concern because of traceability and foreign-influence risks.

15. The Vanishing Crypto Bill

By summer 2026 the detailed crypto bill was no longer prominently available through Reform's website, prompting scrutiny because its disappearance followed the public controversy over Harborne's £5 million gift.

The timing nevertheless makes archival preservation important. The May 2025 document should be treated as a historical policy artefact even if Reform later rewrites or abandons it.

Any future version should be compared line-by-line against the original to identify whether proposals relevant to stablecoins, the digital pound, capital-gains tax or crypto donations have changed.

16. Applying the Seven-Link Influence Ladder

Link	Crypto evidence	Assessment
1 — MONEY	£5m personal gift; £9m + £3m Reform donations in 2025; earlier Brexit Party funding	STRONG
2 — INTEREST	~12% Tether/Bitfinex minority interest; long-standing crypto wealth	STRONG
3 — ACCESS	Long-running Farage relationship; direct gift; party mega-donor	STRONG

Link	Crypto evidence	Assessment
4 — PREFERENCE	Harborne supports UK crypto regulation; historic crypto-policy engagement through DCGG	MODERATE / DOCUMENTED
5 — ALIGNMENT	Reform proposes pro-crypto tax/regulatory package; Farage opposes CBDC and stablecoin caps	STRONG
6 — OPPORTUNITY	Policy could improve UK environment for private crypto/stablecoin activity	STRONG BUT SECTOR-WIDE
7 — BENEFIT / INFLUENCE	No direct evidence Harborne requested Farage's Bank intervention or that Bank policy changed because of Farage	NOT ESTABLISHED

17. What We Can Now Say Safely

- Farage has advocated crypto policies that are commercially aligned with the sector in which his principal donor holds substantial investments.
- Farage and Tice obtained a private meeting with the Bank of England Governor and Farage pressed specific crypto-policy positions.
- The £9 million Harborne donation preceded that meeting.
- Harborne has a documented history of engagement with crypto public policy and has publicly supported UK regulation of cryptocurrency.
- The Bank of England Governor says no policy change resulted from Farage's interventions.
- No public evidence identified here shows Harborne instructed Farage to lobby the Bank, drafted Reform's crypto policy, or made funding conditional on a crypto-policy outcome.

18. What We Still Cannot Say

- That Harborne bought Reform's crypto policy.
- That the £5 million gift was payment for crypto advocacy.
- That the £9 million donation was conditional on the Bank of England meeting.
- That Farage was acting as Harborne's agent.
- That Harborne or Tether drafted Reform's Cryptoassets and Digital Finance Bill.
- That the Bank changed policy because of Farage.
- That opposition to the digital pound exists only to protect Tether rather than reflecting Farage's independently held ideological opposition to CBDCs.

19. The Documents That Would Decide This Question

- The full September 2025 Farage/Tice–Bailey meeting note or minutes.
- The pre-meeting letters between Tice/Reform and the Bank of England.
- Any Reform briefing paper used for the Bailey meeting.
- The drafting history and authorship metadata for Reform's May 2025 Cryptoassets and Digital Finance Bill.
- Records of external consultation on that bill.
- Communications between Harborne and Farage/Tice/Yusuf/Cottrell concerning crypto policy from 2024 onward.
- Communications between Harborne and DCGG or other crypto lobby groups concerning Reform.
- Any contact between Tether/Bitfinex representatives and Reform policy staff.
- The exact chronology of Harborne's £9 million donation commitment versus the request for the Bailey meeting.
- Any evidence that Reform's crypto positions predated Harborne's involvement in substantially identical form.

SECTION 6.3 VERDICT

Crypto is the first donor-policy intersection in this investigation where the evidence reaches beyond coincidence and passive alignment. There is documented political advocacy by Farage on regulatory issues that overlap with the economic environment of Harborne's investments, including direct representations to the Governor of the Bank of England after Harborne's record £9 million Reform donation.

The correct evidential description is therefore: STRONG POLICY ALIGNMENT + DOCUMENTED FARAGE LOBBYING + UNPROVED DONOR CAUSATION.

That is materially more significant than the QinetiQ theory — but it is still not evidence that a policy was bought.

20. A Particularly Important Control: Farage's Pre-2024 Position

The strongest defence available to Farage is chronology: he can point to opposition to CBDCs dating back to 2021, well before the £5 million gift.

That fact prevents a responsible report from claiming Harborne created Farage's anti-CBDC position.

But it does not answer every later question. The September 2025 intervention included not only philosophical opposition to a digital pound but specific advocacy concerning stablecoin regulation and holding limits.

The next evidential question is therefore one of policy granularity: which precise positions existed before Harborne's intensified funding, and which appeared or became operational advocacy afterwards?

Money And Influence: Mapping Reform UK’s Donor Network

6.4 Christopher Harborne, Tax and the Britannia Card: Who Would Benefit?

THE CENTRAL FINDING

The Britannia Card is potentially far more relevant to Christopher Harborne than an ordinary headline tax cut because it is designed specifically for internationally mobile wealthy people who want UK residence while sheltering foreign income, gains and wealth from UK taxation. Harborne is British-Thai, is publicly reported as based in Thailand, and has been described by people who know him as a former UK non-dom who carefully managed his UK days.

That makes him an obvious example of the *type* of person the policy is designed to attract. It does not establish that the policy was designed for him, that he intends to use it, or even that he would qualify on the facts of his tax residence. Those distinctions are crucial.

1. What Reform Actually Proposes

Reform’s Britannia Card offers a 10-year renewable residence permit and preferential UK tax treatment in exchange for a one-off £250,000 contribution.

Reform’s own promotional site says cardholders would pay UK tax only on UK income, with no UK tax on foreign income, foreign gains or foreign wealth, and no inheritance tax on UK assets.

The proposal is explicitly marketed to “internationally mobile wealth creators” and presented as an alternative to both the former non-dom regime and the post-April-2025 residence-based tax system.

The £250,000 contributions are intended to be distributed to lower-paid UK workers, which Reform presents as a direct social dividend from attracting wealthy residents.

Feature	Britannia Card proposal	Current post-April-2025 position
Entry / residence	£250,000 one-off contribution; 10-year renewable residence permit	Normal immigration/residence rules; tax status follows statutory residence and relevant reliefs
Foreign income	No UK tax under card terms	UK residents generally taxed on worldwide income; qualifying new residents may claim 4-year FIG relief
Foreign gains	No UK tax under card terms	UK residents generally taxed on worldwide gains; qualifying new residents may claim 4-year FIG relief
Foreign wealth	Reform advertises protection from UK tax	UK has no general annual wealth tax, but particular income/gains/IHT rules apply
Inheritance tax	Reform advertises no IHT, including on UK assets	From 6 Apr 2025, long-term residence can bring overseas assets within IHT; ordinary UK-situs/IHT rules otherwise apply
Duration	10 years, renewable	FIG exemption limited to first 4 UK-resident years after 10 years non-residence

2. Why the April 2025 Tax Reform Matters

From 6 April 2025 the UK abolished the old remittance-basis regime for resident non-domiciled individuals and replaced it with a residence-based system.

HMRC states that UK residents are now generally taxed on worldwide income and gains, subject to a four-year foreign income and gains (FIG) regime for qualifying new residents who have been non-UK resident for at least ten consecutive tax years.

The Britannia Card would therefore not merely recreate the four-year FIG regime. It would offer a much longer ten-year preferential period and, on Reform's published description, broader inheritance-tax protection.

For an internationally mobile billionaire considering whether to become or remain UK resident, that difference can be economically substantial.

3. Harborne Fits the Policy's Target Demographic — on the Public Facts

Harborne was born in Britain but naturalised as a Thai citizen in 2011 and is also known as Chakrit Sakunkrit.

Current profiles describe him as based in Thailand, where he has extensive personal and business connections.

The Guardian reported in April 2026 that two people who know Harborne said he had for years been a non-dom and carefully limited the number of days he spent in Britain to avoid triggering UK tax consequences.

That reporting is not an HMRC determination and this report does not know Harborne's present statutory residence status, historic tax filings or domicile/residence calculations.

Nevertheless, an internationally mobile British-Thai billionaire with substantial foreign investment income is plainly within the broad population Reform says it wants the Britannia Card to attract.

DO NOT OVERSTATE THIS

The report cannot state that Harborne "would get the Britannia Card" or "would save £X" without his actual tax-residence history, income/gains profile, asset location and the final legislation. The defensible statement is that the published eligibility concept and tax advantages appear potentially relevant to a person with Harborne's reported circumstances.

4. A British Citizen Could Still Be Relevant

The policy has often been described as a scheme for wealthy foreigners, but contemporary reporting says Reform also envisaged returning British citizens among those it wished to attract.

That is important in Harborne's case because British citizenship does not itself determine UK tax residence.

A British citizen living abroad can be non-UK resident for tax purposes and may return to UK residence. Tax liability depends on the statutory residence rules and the specific tax regime, not simply the passport held.

Harborne's dual British-Thai citizenship therefore does not, by itself, take him outside the policy's conceptual target group.

5. The Donation Rules Create a Separate Reason Residence Matters

Harborne's residence has significance beyond personal taxation because the government has announced tighter rules on large political donations from eligible donors living overseas.

Recent reporting has specifically identified Harborne as a person potentially affected by the proposed £100,000 cap on donations from otherwise eligible individuals living abroad.

That creates an unusual intersection: a Reform policy intended to make UK residence more attractive to wealthy internationally mobile people could also, depending on the final political-finance legislation and residence tests used, affect the practical circumstances under which a major overseas-based supporter participates in UK political funding.

This should not be described as a loophole unless the final statutory rules actually produce one. The tax/residence scheme and donation-eligibility rules are separate legal regimes and may use different tests.

AN IMPORTANT TWO-SYSTEM INTERSECTION

The Britannia Card is principally a tax-and-residence policy. Political-donation eligibility is governed separately. But Harborne makes the interaction worth monitoring because he is both an overseas-based wealthy individual and Reform's dominant donor. Any final legislation should be tested for whether card residence changes donor eligibility or donation limits.

6. How Large Could the Tax Advantage Be?

For an ultra-high-net-worth person with very large foreign income or gains, £250,000 can be small relative to ten years of UK tax that might otherwise arise after becoming UK resident.

That does not mean every cardholder would save money. Someone with modest foreign income, limited gains or only a short stay could pay more under the card than under ordinary rules.

The economic value is therefore highly concentrated among people with sufficiently large offshore income, gains or estates.

This is why a flat £250,000 price can be regressive within the wealthy population itself: the larger the protected foreign tax base, the smaller the fee becomes as a proportion of the potential tax saving.

Illustrative foreign taxable amount	£250k fee as % of amount	What this illustrates
£1m	25%	Card price is substantial relative to protected amount
£5m	5%	Fee becomes comparatively small

Illustrative foreign taxable amount	£250k fee as % of amount	What this illustrates
£10m	2.5%	Ultra-wealthy users can amortise fee rapidly
£50m	0.5%	Flat fee is tiny relative to very large offshore gains/income
£100m	0.25%	Policy value rises sharply with scale of foreign wealth flows

These percentages are illustrative ratios only. They are not estimates of tax saved and do not model timing, tax rates, reliefs, residence, asset type or double-tax treaties.

7. Harborne's Crypto Wealth Makes the Question Potentially Material

Section 6.3 established Harborne's material minority interest in Tether/Bitfinex and the scale of his crypto-derived wealth.

If a UK-resident cardholder realised large foreign crypto gains that qualified for the Britannia Card exemption, the difference between ordinary UK taxation and card treatment could be significant.

But whether Harborne personally would obtain that treatment depends on facts not established publicly: where the relevant assets are situated for tax purposes, where disposals occur, whether gains are treated as foreign, his residence status, applicable anti-avoidance rules and the exact drafting of Reform's legislation.

It would therefore be irresponsible to multiply an estimated Tether stake by a UK capital-gains rate and present the result as a Harborne tax saving.

8. The Separate 10% Crypto CGT Proposal

Reform's May 2025 crypto package proposed reducing capital gains tax on cryptoassets from 24% to 10%.

Unlike the Britannia Card, that policy is sector-specific rather than residence-specific.

If applicable to a UK-taxable disposal, the rate reduction could benefit crypto investors generally, including very large investors.

But a person who is non-UK resident may already fall outside UK CGT on many assets, while a Britannia Card holder might obtain separate exemption for qualifying foreign gains. The two policies therefore should not simply be added together as though every wealthy crypto investor receives both benefits on the same gain.

The correct analysis requires a tax-status scenario for each taxpayer.

9. Scenario Analysis: Harborne

Scenario	Likely relevance of Britannia Card	Likely relevance of 10% crypto CGT
Harborne remains non-UK resident in Thailand	Limited direct UK income/gains-tax advantage because non-residents are already outside UK tax on many foreign gains; residence permit may have lifestyle value	Often limited for non-UK-taxable disposals
Harborne returns to UK and qualifies for 4-year FIG regime	Britannia Card may become more valuable after/relative to four-year relief, depending on rules	Could matter for UK-taxable crypto gains not otherwise exempt
Harborne returns and does not qualify for FIG	Potentially very valuable if substantial foreign income/gains become taxable under ordinary arising basis	Potentially valuable on taxable crypto disposals
Harborne becomes long-term UK resident	Potential IHT dimension becomes increasingly important under current residence-based rules	CGT relevance depends on disposals
Final Britannia rules exclude British citizens or existing/former residents	Potential personal benefit could disappear	Crypto CGT proposal remains a separate issue

10. The Policy Could Be Worth More to Harborne Than the Donation — But We Cannot Know Yet

It is mathematically possible for ten years of tax exemption on very large foreign income and gains to be worth considerably more than Harborne's political donations.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

To establish an actual personal benefit, the report would need Harborne's taxable foreign income/gains, residence intentions and the enacted card rules.

Without those inputs, claims such as “Harborne donated £12m to save £X million in tax” would be speculation and should not appear in the report.

THE TEMPTING BUT UNSUPPORTED HEADLINE

“Farage’s billionaire donor gives Reform millions, then Reform offers him a £250,000 route to avoid UK tax.”

Parts of that sentence are factually grounded; the implied causal story is not. We can establish that Harborne is a huge donor, that he is overseas-based and reportedly formerly non-dom, and that Reform proposes a regime potentially attractive to people like him. We cannot presently establish that the policy was created for Harborne or that he intends to use it.

11. The Policy Predates Harborne’s 2025 Mega-Donations — But Not His Relationship With Farage

The Britannia Card was announced on 23 June 2025.

Harborne’s record £9 million Reform donation was received on 31 July 2025, followed by £3 million in November.

The policy therefore predates those two donations and cannot responsibly be described as a response to them without additional evidence.

But it postdates Harborne’s many years of Brexit Party/Reform funding and the reported £5 million personal gift to Farage in 2024.

As with the crypto bill, timing narrows the hypothesis rather than resolving it: the relevant question is whether Harborne or other wealthy overseas supporters were consulted before the policy was launched.

12. Reform Explicitly Designed the Policy Around Wealth Mobility

Reform’s own language is unusually candid about the intended constituency: “internationally mobile wealth creators”.

Farage presented the policy as a response to wealthy people leaving or avoiding Britain because of tax changes.

This is not hidden donor favouritism; attracting wealthy mobile taxpayers is the stated policy objective.

The scrutiny question is therefore not whether rich internationally mobile people benefit — Reform openly intends that they should. The question is whether particular donors received privileged access to shape the terms.

13. The Fiscal Model Is Highly Sensitive to Behaviour

Reform argues that the £250,000 contributions would generate revenue and attract investment that would otherwise leave the UK.

Critics argue that the policy could surrender much larger amounts of income, gains and inheritance tax from people who would have lived in Britain anyway.

Both effects are behavioural and difficult to forecast: how many additional wealthy people move to Britain because of the card, how many existing/returning residents switch into it, and how much taxable income would otherwise have been collected?

The fiscal verdict therefore depends on a counterfactual population that cannot be observed directly.

14. Current Law Makes the Counterfactual Clearer Than the Old Non-Dom Debate

Under current HMRC rules, a qualifying new resident can receive four years of relief on eligible foreign income and gains after at least ten consecutive years of non-UK residence.

After that period, a UK resident is generally taxed on worldwide income and gains on the arising basis.

The Britannia Card would extend preferential treatment to ten years on Reform's published terms and charge £250,000 for access.

For someone who would otherwise remain UK resident beyond four years with very large foreign returns, the potential tax difference is therefore structurally obvious even if the precise amount is unknowable.

15. Inheritance Tax May Be the Bigger Prize for Some Users

From April 2025 the UK moved inheritance tax toward a long-term residence basis, so overseas assets can enter the IHT net for long-term UK residents.

Reform's published Britannia Card language promises no inheritance tax and specifically advertises no IHT on UK assets.

For older ultra-high-net-worth individuals with substantial estates, inheritance-tax treatment may be more valuable than annual income-tax relief.

Again, whether this matters to Harborne personally would require details of his estate planning, residence history and the final legislative drafting — information this report does not possess.

16. Applying the Seven-Link Influence Ladder

Link	Britannia Card evidence	Assessment
1 — MONEY	Harborne: long-term Brexit Party/Reform funding; £5m personal Farage gift; £12m Reform donations in 2025	STRONG
2 — INTEREST	Internationally mobile, Thailand-based British-Thai billionaire; reported former non-dom; large foreign investment interests	STRONG / RELEVANT

Link	Britannia Card evidence	Assessment
3 — ACCESS	Longstanding relationship with Farage and extraordinary personal/party funding	STRONG
4 — PREFERENCE	No public evidence located that Harborne asked for a non-dom/Britannia-style tax regime	NOT ESTABLISHED
5 — ALIGNMENT	Britannia Card is tailored to internationally mobile wealthy people and could potentially suit Harborne's circumstances	STRONG GENERAL ALIGNMENT
6 — OPPORTUNITY	Potentially substantial tax/residence benefit if he returned and qualified	PLAUSIBLE BUT UNQUANTIFIED
7 — BENEFIT / INFLUENCE	No evidence Harborne designed, requested or has used the policy	NOT ESTABLISHED

17. What We Can Say Safely

- Harborne appears to fit the broad economic profile Reform says the Britannia Card is intended to attract.
- The policy could potentially be valuable to an overseas-based billionaire with substantial foreign income and gains who wished to become UK resident.
- Harborne's reported former non-dom status makes the policy intersection more than purely theoretical.
- The Britannia Card predates Harborne's £9m and £3m 2025 Reform donations, but postdates his long-running funding relationship and £5m personal gift to Farage.
- No public evidence located for this chapter shows Harborne requested, drafted or negotiated the Britannia Card.

18. What We Cannot Say

- That the Britannia Card was created for Christopher Harborne.
- That Harborne is currently a UK non-dom — the old regime ended in April 2025 and his present tax residence is not established here.
- That Harborne would qualify for the card under final legislation.
- That he intends to return to Britain or purchase a card.

- That the policy would save him a particular amount of tax.
- That his donations were made in exchange for preferential tax treatment.
- That the card would automatically allow him to bypass future political-donation restrictions.

19. The Evidence That Would Change the Verdict

- Internal Reform records identifying Harborne or his representatives among Britannia Card consultees.
- Emails/messages in which Harborne discusses non-dom reform, residence incentives or the £250,000 scheme with Farage or Reform officials.
- Drafting records showing donor input into the card's price, duration or tax exemptions.
- Evidence Harborne planned a UK return conditional on Reform changing the tax regime.
- An application by Harborne if the scheme were enacted.
- Final political-finance legislation showing that Britannia Card residence materially changes donation eligibility or limits.
- Harborne tax/residence records sufficient to calculate a real rather than hypothetical benefit.

SECTION 6.4 VERDICT

The Britannia Card presents a genuine donor-policy alignment worth recording because Christopher Harborne appears, on public information, unusually close to the demographic the policy is designed to attract: very wealthy, internationally mobile, overseas-based, dual-national and reportedly formerly non-dom.

But the evidence currently reaches only MONEY + INTEREST + ACCESS + GENERAL POLICY ALIGNMENT. Unlike crypto, there is no documented Harborne policy advocacy and no equivalent of Farage's Bank of England intervention. The appropriate verdict is therefore:

POTENTIALLY MATERIAL PERSONAL BENEFIT — NO EVIDENCE OF DONOR CAUSATION.

20. An Unexpected Contrast With Reform's Immigration Politics

The Britannia Card also exposes a deliberate distinction within Reform's migration platform.

The party proposes exceptionally restrictive treatment for many migrants while simultaneously offering a ten-year residence route to wealthy internationally mobile people for £250,000.

That is not necessarily a logical contradiction: immigration systems routinely distinguish between categories of entrant based on skills, investment, family or humanitarian status.

But it demonstrates that Reform's objection is not to immigration in the abstract. Its policy explicitly assigns preferential access and tax treatment to a class of wealthy migrants it considers economically desirable.

For the donor investigation, the significance is narrower: the beneficiaries of that preferential class overlap socially and economically with some of the party's largest financial supporters.

Money And Influence: Mapping Reform UK’s Donor Network

6.5 The Donor–Policy Matrix: Is There a Wider Pattern?

THE FINDING

Yes — but the pattern is more specific than “business donors buy policies”. Reform’s modern donor base is heavily concentrated among wealthy investors, financiers, entrepreneurs and business owners who broadly favour lower tax, lighter regulation, Brexit sovereignty and a more business-friendly state. That ideological alignment is unsurprising. More noteworthy is the clustering in a handful of policy-sensitive sectors: cryptocurrency/digital assets, investment/finance, property, life sciences, industrial manufacturing and defence/security.

The strongest sectoral concentration is cryptocurrency. In Q1 2026 alone, Christopher Harborne and Ben Delo supplied £7 million — about three-quarters of Reform’s private fundraising for the quarter — while Reform was explicitly promising a pro-innovation regime for digital assets. That is a structural donor-policy alignment, not proof that either donor wrote the policy.

1. Why a Matrix Is More Useful Than a List of Rich Donors

A donor list tells us who supplies money. An influence investigation must ask whether particular types of money repeatedly intersect with particular types of policy.

The matrix therefore separates four questions: what sector produced the donor's wealth; what Reform policy could affect that sector; whether the policy predates the donor; and whether any evidence shows direct advocacy or privileged access.

A high number of overlaps is not inherently suspicious. A low-tax, deregulatory party will naturally attract businesspeople who prefer low tax and deregulation. The evidentially interesting cases are narrower: concentrated funding from one sector, unusually specific policy benefits, donor participation in policy development, or a policy shift following documented advocacy.

2. The 2026 Funding Base Has Become Even More Concentrated

Electoral Commission data for Q1 2026 show Reform raising roughly £9.3 million in private donations, ahead of Labour and the Conservatives.

Two cryptocurrency billionaires dominated that total: Ben Delo gave £4 million and Christopher Harborne £3 million. Reuters described the pair as the principal reason for Reform's fundraising lead.

David Grainger, a biotechnology entrepreneur and venture capitalist, supplied about £1.1 million during the quarter. Navroz Udwadia, co-founder of investment firm Alpha Wave, gave £250,000. Bassim Haidar, whose businesses span fintech, telecoms, technology, logistics and other sectors, also continued giving.

The significance is not merely that Reform attracts wealthy donors. It is that a very small number of investors can transform the party's financial capacity.

CONCENTRATION BEFORE INFLUENCE

In Q1 2026, Harborne + Delo = £7m. Against approximately £9.3m of Reform private fundraising, that is roughly three-quarters of the quarter's total. A party can therefore become financially dependent on a sector even without any evidence that its donors issue instructions.

3. The Core Donor–Policy Matrix

Donor / network	Documented business or financial interest	Relevant Reform policy area	Current evidential reading
Christopher Harborne	Crypto (Tether/Bitfinex); QinetiQ; aviation/other investments	Digital assets; CBDC/stablecoins; defence/security; Britannia Card; deregulation	STRONG alignment; documented Farage crypto lobbying; donor causation unproved

Donor / network	Documented business or financial interest	Relevant Reform policy area	Current evidential reading
Ben Delo	BitMEX co-founder; cryptocurrency wealth	Digital assets; crypto tax/regulation; overseas-donor rules; pro-innovation agenda	STRONG sector alignment; stated ideological motive; no evidence he drafted policy
David Grainger	Biotechnology/life-sciences venture capital; Medicxi	Life sciences; emerging technology; regulation; NHS/health innovation	CLEAR sector-policy relevance; direct advocacy not established
Nick Candy	Property development/investment; mining investment; Reform treasurer/fundraiser	Planning; business tax; Britannia Card; investment; deregulation	STRONG access + broad business alignment; policy-specific causation not established
Bassim Haidar	Fintech, telecoms, technology, logistics, energy, investment, medicinal cannabis	Fintech/digital innovation; business tax; regulation; technology; Britannia Card-type mobility	BROAD alignment; public pro-business rationale; no specific policy influence established
Jeremy Hosking	Investment management/finance; long-term Brexit political funding	Brexit/sovereignty; ECHR; tax/deregulation; cultural policy	Primarily IDEOLOGICAL; explicit political preferences documented
JCB / Bamford network	Industrial manufacturing, construction equipment	Manufacturing; cheaper energy; procurement favouring British firms; deregulation	DIRECT sector alignment; donor also gave Conservatives; no Reform-specific quid pro quo

Donor / network	Documented business or financial interest	Relevant Reform policy area	Current evidential reading
Greybull Capital	Private equity; industrial turnarounds including historic British Steel ownership	Manufacturing; energy costs; British procurement; industrial strategy	RELEVANT overlap but weak influence evidence
R20 / Robert Tchenguiz network	Property/investment	Planning; property; tax; deregulation	GENERAL commercial alignment; funding-source transparency warrants separate scrutiny
Johan Christofferson	Hedge-fund / investment management	Tax; financial regulation; business policy	GENERAL alignment; no direct influence evidence located
Fiona / George Cottrell network	Political access; George Cottrell's finance/crypto background	Party governance; leadership; crypto/finance potentially relevant	ACCESS / FUNDING-ARCHITECTURE case stronger than sector-policy case
Richard Tice / TISUN	Property/investment and party leadership finance	Tax; planning; energy/net zero; business regulation	RELATED-PARTY governance and ideological alignment; analysed separately

4. Crypto Is Not Just One Donor Any More

Section 6.3 showed why Harborne alone created a serious crypto-policy transparency question. The 2026 donations make the structural point stronger: Reform now has two enormous crypto-derived fortunes among its dominant funders.

Ben Delo's £4 million in Q1 2026 exceeded the private quarterly fundraising of many established political organisations. Harborne supplied another £3 million in the same quarter.

Reform's current policy platform explicitly says Britain should become a world leader in "digital assets" through a pro-innovation regulatory environment. Its 2025 package went further, proposing crypto-specific capital-gains reductions, a bitcoin reserve and protections against crypto debanking.

This means crypto is no longer best described as "Harborne has an interest that overlaps with Reform". It is now accurate to say that a sector with a strong interest in regulatory design supplies an unusually large share of Reform's political capital.

That still does not tell us which direction causation runs. Crypto billionaires may be choosing Reform because Reform is already the most crypto-friendly major UK party.

STRUCTURAL FINDING — CRYPTO

The evidential concern is now sectoral concentration rather than a single suspicious coincidence. Two major crypto fortunes supplied approximately £7m to Reform in Q1 2026 while the party advocated a distinctly crypto-friendly regulatory agenda. The missing evidence remains the same: donor communications, policy drafting input or conditional funding.

5. David Grainger Creates a New Life-Sciences Test

David Grainger is a co-founder and venture partner at Medicxi, with a long career in biotechnology, drug development and life-sciences investment. Medicxi's own biography records investments and company-building across pharmaceutical and biotech ventures.

Electoral Commission-derived reporting puts his Reform donations at roughly £1.1 million in Q1 2026, making him one of the party's largest recent donors.

Reform's current platform explicitly identifies "life sciences" among the emerging technologies it wants to support through a pro-innovation regulatory environment.

That is a real sector-policy overlap, but at present it is generic. A political party promising to make Britain attractive to life sciences is not unusual and the policy could benefit a very broad industry.

The influence question becomes meaningful only if Grainger is found to have advised Reform on drug regulation, NHS procurement, clinical trials, biotech taxation, intellectual property or another specific measure.

6. Finance and Investment Are the Background Environment

A large part of Reform's donor universe comes from finance, investment management, private equity or venture capital: Harborne, Delo, Hosking, Udwadia, Christofferson, Tchenguiz-linked entities and others.

Reform simultaneously promises lower business taxes, reduced red tape, simplified planning and a generally pro-enterprise state.

This overlap is politically meaningful but evidentially weak as proof of donor influence because those policies are foundational features of Reform's public economic identity. Wealthy investors can rationally select the party for those policies without ever changing them.

The matrix should therefore treat broad tax/deregulation alignment as a baseline rather than repeatedly presenting it as a discovery. Specific exemptions, bespoke tax vehicles, regulatory interventions and procurement rules deserve greater weight.

7. Nick Candy Is Different Because He Is Inside the Fundraising Machine

Nick Candy is not simply a property developer who donates to Reform. He is the party's honorary treasurer and chief fundraiser, giving him an organisational role in building the donor network.

He has donated around £1 million himself and publicly targeted high-net-worth supporters, including internationally mobile wealthy people.

The Britannia Card was launched with Candy present alongside Farage and Zia Yusuf. That does not establish Candy designed it, but his dual role — wealthy investor and architect of Reform's high-net-worth fundraising — makes policy development affecting wealthy mobile investors especially important to document.

Candy's business portfolio also extends beyond property, including a major interest in a gold-mining venture in Nicaragua. The breadth of his investments means "a policy might benefit Candy" is too easy a claim to make. Only specific, material intersections should be elevated.

8. Manufacturing Donors Align With Reform's Industrial Agenda

JCB gave Reform £200,000 in late 2025 while also making a matching donation to the Conservatives. The company said the donations reflected both parties' support for small business.

Reform promises cheaper energy, simpler regulation, procurement policies favouring British producers and a revival of domestic manufacturing. Those policies plainly align with the interests of UK industrial manufacturers such as JCB.

But JCB's simultaneous Conservative donation is a useful control. It suggests support can be portfolio-style political engagement rather than an exclusive Reform bargain.

The appropriate question is whether Reform develops procurement or regulatory provisions unusually tailored to particular donors, not whether a British manufacturer prefers cheaper energy and lower regulation.

9. Greybull Shows Why Historical Business Controversy Is Not Influence Evidence

Greybull Capital donated £100,000 to Reform in June 2025. The private-equity firm is well known for its former ownership of British Steel and other distressed businesses.

Reform advocates British manufacturing, cheaper energy and procurement favouring British producers — areas that intersect with industrial investment.

Greybull's history may justify separate due-diligence questions about donor reputation, but it does not itself establish influence over Reform's manufacturing policy.

This is a useful discipline for the report: controversial commercial history and policy alignment are separate evidential categories.

10. Bassim Haidar Demonstrates the Problem With Very Broad Portfolios

Bassim Haidar's own business biography spans fintech, technology, telecoms, logistics, energy, engineering, venture investment and medicinal cannabis.

He has also funded Conservative political interests, attended high-value Reform fundraising and subsequently donated substantial sums to Reform and Farage.

With a portfolio that broad, almost any pro-business policy can be said to overlap with something he owns. That makes simple sector matching particularly vulnerable to false positives.

For Haidar, the investigation should require a much narrower trigger: a policy affecting a named business, regulatory market or investment, plus evidence of advocacy or access around that specific decision.

11. The Old Donor Base and the New Donor Base Are Not Identical

The Brexit Party/Reform funding network began with Brexit-focused financiers and businesspeople such as Harborne, Hosking and Tice.

By 2025–26 the donor pool has widened to include property, fintech, crypto, biotech, private equity, manufacturing and global investment figures.

The common denominator is less a single industry than a political-economic worldview: sovereignty, lower taxation, hostility to regulation, opposition to net zero costs and a belief that the state should create a friendlier environment for capital and enterprise.

Crypto stands out because its funding concentration is disproportionately large and because Farage has undertaken specific regulatory lobbying rather than merely stating a general pro-business preference.

12. A Sector Scorecard

Sector / interest	Funding concentration	Policy specificity	Documented donor advocacy	Current priority
Crypto / digital assets	VERY HIGH	HIGH	Harborne policy engagement; Delo public ideological advocacy; direct donor instruction not shown	RED — highest scrutiny
Finance / investment / tax	HIGH	Mostly broad; Britannia Card is specific	Some donor views public; policy-input evidence limited	AMBER-RED
Property / planning	MODERATE	Broad planning/tax deregulation	No strong donor-specific trail located	AMBER

Sector / interest	Funding concentration	Policy specificity	Documented donor advocacy	Current priority
Life sciences / biotech	EMERGING / MATERIAL	Current platform explicitly names life sciences but remains broad	None located for Grainger	AMBER — monitor
Manufacturing / industrial	MODERATE	Cheaper energy + British procurement are specific enough to matter	JCB rationale is public; no quid pro quo evidence	AMBER
Defence / security	Harborne exposure significant; donor-base concentration unclear	Rearmament/ procurement potentially high-value	No Harborne→Qinet iQ policy request located	AMBER
Energy / net zero	Donor interests exist but matrix is diffuse	Reform position is longstanding and highly ideological	No single causal donor trail established	AMBER / ideological baseline
Healthcare / NHS	Grainger/life sciences relevant; other donor links need mapping	Current NHS policy broad	No specific donor influence located	GREEN-AMBER

13. The Most Important Finding Is Dependency, Not Corruption

The matrix does not reveal a catalogue of proven purchased policies. It reveals something institutionally different: a party whose ability to compete nationally can depend heavily on a small number of ultra-wealthy people.

That dependency matters even if every donor behaves lawfully and never asks for anything. A leadership contemplating a policy that seriously harms its dominant funding constituency may face a practical financial constraint that a broadly funded membership party does not face to the same degree.

This is structural influence: not “do this or I stop paying”, but the background knowledge that a tiny number of relationships can determine campaign capacity.

It is difficult to prove how much such dependency affects internal decision-making without minutes, correspondence and testimony. But concentration itself is measurable.

THE STRUCTURAL RISK

A mega-donor does not need to telephone a party leader with instructions for concentrated funding to matter. If two people supply most of a quarter's private income, their continued willingness to fund the organisation becomes an objective strategic consideration. That is a governance risk even where no improper transaction exists.

14. The Matrix Also Produces Evidence Against a Simple "Bought Party" Theory

Several major Reform positions clearly predate the newest donors: Brexit, opposition to net zero, lower taxation, deregulation, tougher immigration policy and opposition to the ECHR.

JCB donated to both Reform and the Conservatives, showing that some corporate political finance is deliberately non-exclusive.

Hosking's political giving has long been overtly ideological. Delo has described his 2026 donation as his first major political intervention motivated by broader political concerns.

Grainger's life-sciences interests overlap with a generic pro-innovation policy, but there is no current evidence that he caused it.

These counterexamples matter. They make the crypto case more, not less, significant because crypto contains the additional element of specific institutional lobbying.

15. The Donor Base Is Not the Electorate

Reform's electoral message frequently emphasises working people, national decline, wages, migration and public services. Its large-donor economy is necessarily much narrower and wealthier than its voter coalition.

That is not unique to Reform: all major parties raise money from constituencies that do not perfectly mirror their voters.

The democratic question is whether the policy agenda is more responsive to the marginal voter who supplies one vote or the marginal mega-donor who can supply millions of pounds.

The public donation register cannot answer that question by itself. Internal policy-development records can.

16. What Would Turn a Pattern Into Evidence of Influence?

- A recurring donor sector being formally or informally consulted while affected groups outside the donor network are excluded.
- Policy drafts changing after donor meetings in ways specifically advantageous to donor businesses.
- Internal correspondence describing fundraising consequences of taking or rejecting a policy position.
- A donor or fundraiser linking future financial support to a policy commitment.

- Government-contract planning involving donor-linked firms before an open procurement process.
- Bespoke tax or regulatory provisions whose design closely matches a donor's circumstances and cannot be explained by the stated general policy objective.
- Repeated interventions by Reform politicians with regulators or public bodies on matters directly relevant to major donors.

17. What Would Weaken the Pattern?

- Evidence that policies were drafted and publicly committed before the relevant donors arrived.
- Broad consultation records showing donors had no privileged policy access.
- Evidence that Reform rejected donor requests or adopted policies financially adverse to major donors.
- Competitive procurement in which donor-linked companies receive no special treatment or do not bid.
- A diversified funding base reducing dependence on any sector or individual.
- Documented donor motives that are ideological and unrelated to their commercial interests, where consistent with their wider political giving.

18. Preliminary Verdict by Donor

Donor	Money	Access	Specific policy overlap	Direct advocacy / bridge	Verdict
Harborne	Exceptional	Exceptional	Crypto: high; tax/security: material	Farage lobbying documented; Harborne instruction not documented	HIGHEST PRIORITY
Delo	Exceptional in 2026	Developing / not fully mapped	Crypto: high	Personal ideological statements; no policy bridge located	HIGH PRIORITY
Grainger	Very high	Not yet mapped	Life sciences: clear but broad	None located	MONITOR / RESEARCH

Donor	Money	Access	Specific policy overlap	Direct advocacy / bridge	Verdict
Candy	High + fundraiser role	Institutional	Property/tax/investment: broad; Britannia relevant	Role in donor strategy documented; policy causation not established	HIGH GOVERNANCE PRIORITY
Hosking	Long-term high	Political network	Sovereignty/ECHR/culture	Preferences explicit and ideological	IDEOLOGICAL INFLUENCE CASE
Haidar	Material	Fundraising access	Very broad business overlap	No specific bridge located	MONITOR
JCB/ Bamford	Material corporate	Some Farage access	Manufacturing/energy/ procurement	Public business rationale; cross-party giving	MONITOR
Greybull	£100k	Not established	Industrial policy	No bridge located	LOWER PRIORITY

SECTION 6.5 VERDICT

The wider pattern is real, but it is not a single-industry conspiracy. Reform is financed disproportionately by wealthy owners and investors whose economic preferences naturally align with its low-tax, deregulatory, pro-business politics. Within that broad pattern, cryptocurrency is exceptional: the sector now supplies a very large share of the party's money and is also the subject of unusually specific Reform policy and direct lobbying by Farage.

The correct conclusion is therefore:

STRUCTURAL BUSINESS-DONOR ALIGNMENT + EXTREME FUNDING CONCENTRATION + ONE HIGH-PRIORITY SECTOR (CRYPTO) — NOT A GENERAL FINDING THAT REFORM POLICIES HAVE BEEN BOUGHT.

19. What This Changes About Part VI

The investigation should no longer proceed donor-by-donor indefinitely. The matrix tells us where the evidence is strongest and where additional work is least likely to produce anything beyond generic ideological alignment.

Crypto deserves continued forensic treatment. The spring 2024 Farage return/gift chronology remains a separate high-priority governance issue. Candy's fundraising role and the Britannia Card merit a policy-development audit. Grainger creates a new life-sciences lead worth one targeted investigation.

Other sectors should be monitored rather than inflated into allegations without a bridge.

This prioritisation prevents the report from becoming a catalogue of coincidences.

20. Recommended Next Investigation

- Map Ben Delo's political network, Reform access and crypto-policy positions after his £4m entry into the donor base.
- Establish whether Delo had contact with Farage/Tice before or around the Bank of England crypto lobbying.
- Audit David Grainger's access and any participation in Reform life-sciences or NHS policy development.
- Identify the authors/consultants behind Reform's "emerging technologies" policy language.
- Build a donor-sector concentration table from Electoral Commission data covering 2019–Q1 2026, coding donors by primary wealth source.
- Compare Reform's funding concentration with Labour, Conservative, Liberal Democrat and Green donor concentration using the same thresholds.
- Create a prospective procurement watchlist for donor-linked companies only where a plausible policy-created market has already been identified.

Money And Influence: Mapping Reform UK's Donor Network

6.6 Ben Delo: Second Crypto Mega-Donor - Independent Confirmation or New Influence?

THE CENTRAL FINDING

Ben Delo is an unusually valuable control case for the donor-influence hypothesis. Reform had already announced its detailed pro-crypto platform in May 2025, months before Delo became a disclosed £4 million donor in January-March 2026. That chronology strongly supports self-selection: a crypto billionaire chose to fund a party whose crypto politics already aligned with his interests.

But Delo is not merely a passive cheque-writer. He has built a Westminster political network, supplied space and support to actors across the political right, publicly committed himself to Reform, and said he intends to return from Hong Kong so he can continue donating despite new overseas-donor restrictions. The strongest current finding is therefore: INDEPENDENT CONFIRMATION OF SECTORAL ALIGNMENT + MAJOR CAPACITY INFLUENCE - NO EVIDENCE YET THAT DELO CAUSED REFORM CRYPTO POLICY.

1. Who Is Ben Delo?

Ben Delo is a British mathematician, software engineer and cryptocurrency entrepreneur who co-founded the derivatives exchange BitMEX.

He became extremely wealthy through BitMEX and has subsequently described himself as a philanthropist focused on free enquiry, academic freedom, mathematics, neurodiversity and Commonwealth collaboration.

Public reporting in 2026 placed him in Hong Kong, although he announced that he intended to move back to Britain.

Unlike Christopher Harborne, Delo was a first-time disclosed Reform donor in Q1 2026. That makes his chronology particularly useful for testing whether Reform changed policy to attract crypto money or whether crypto money moved toward an already crypto-friendly party.

2. The £4 Million Arrived in Two Equal Tranches

Accepted date	Donor	Amount	Context
14 January 2026	Ben Peter Delo	£2,000,000	First disclosed Reform donation

Accepted date	Donor	Amount	Context
2 March 2026	Ben Peter Delo	£2,000,000	Second tranche
Q1 2026 total	Ben Delo	£4,000,000	Largest individual Reform donor in the quarter

Electoral Commission data records two £2 million cash donations accepted by Reform on 14 January and 2 March 2026.

Reform accepted £9.262 million in private donations during Q1 2026. Delo and Harborne alone supplied £7 million - approximately three-quarters of that private total.

Delo therefore moved almost immediately from no disclosed Reform donation history to being one of the party's most financially important individuals.

CAPACITY MATTERS

A £4 million donor does not need to write a manifesto clause to matter politically. Farage himself said Delo's support would help Reform attract the skills and talent needed to prepare for government. That is an unusually direct acknowledgement of capacity influence: donor money funding the party's ability to recruit, organise and professionalise.

3. The Natural Experiment: Reform Crypto Policy Came First

Reform announced its Cryptoassets and Digital Finance Bill at Bitcoin 2025 in Las Vegas on 29 May 2025.

The package included a proposed crypto capital-gains-tax cut, a bitcoin reserve, anti-debanking measures and an explicitly pro-digital-assets regulatory stance.

Delo's first disclosed £2 million donation was not accepted until 14 January 2026 - more than seven months later.

This sequencing is powerful evidence against the simplest claim that Delo bought Reform's original crypto policy. He could not have purchased with a January 2026 donation a public policy package announced in May 2025 unless evidence emerged of earlier undisclosed involvement.

No such earlier Delo role in drafting Reform's crypto platform has been identified in the public material reviewed for this section.

A USEFUL CONTROL CASE

Delo strengthens the proposition that wealthy crypto figures are selecting Reform because its politics already suit them. That does not eliminate later influence. It changes the question from "Did Delo create the policy?" to "What access and policy influence did £4m buy after he joined the donor base?"

4. Delo Explains His Own Motive - and It Is Broader Than Crypto

When Delo publicly disclosed his donations in April 2026, he did not present cryptocurrency regulation as his principal motivation.

He described becoming politically active for the first time because he believed Britain's governing culture had become dishonest and dysfunctional, with particular emphasis on free speech, political correctness and culture-war issues.

He said the £4 million was intended to help Farage build Reform into a genuine alternative party of government.

That account is consistent with Delo's wider philanthropic branding around free enquiry and open debate. It also provides an alternative explanation to a narrow commercial quid-pro-quo theory.

5. Delo Is Not Politically Exclusive to Reform

Guardian reporting found that Delo had developed a Westminster political base known as the Sanctuary, providing rooms, event space, office facilities and podcasting resources to a range of organisations and figures.

Beneficiaries included people on different parts of the political right and wider public life. Reporting identified support in kind for Rupert Lowe as well as contacts with Conservative figures including Kemi Badenoch and Michael Gove.

Restore Britain launched its mass-deportation campaign from the Sanctuary, while Delo's lawyers stressed that providing facilities or support did not mean he endorsed every view expressed by recipients.

This wider network is important evidence against treating the £4 million as proof of a uniquely Reform-specific commercial arrangement. It suggests Delo is building ideological and institutional influence across a broader political ecosystem.

6. The Sanctuary Changes the Meaning of "Influence"

Political influence is not limited to donations. Physical infrastructure can create networks, introductions, events, media production and repeated contact between politicians, campaigners, intellectuals and funders.

Delo's Westminster base therefore represents a form of ecosystem capacity: it can reduce the cost of organising political activity and create a venue in which relationships develop.

There is no evidence that the Sanctuary itself controls Reform policy. But it demonstrates that Delo's political role extends beyond transferring money into a party bank account.

For this investigation, future searches should map who from Reform used the Sanctuary, for what purpose, on which dates, and whether policy-development meetings occurred there.

7. Delo's BitMEX Regulatory History Is Directly Relevant to the Deregulation Question

In 2020 US authorities charged BitMEX and its founders over registration and anti-money-laundering failures.

Delo pleaded guilty in 2022 to a Bank Secrecy Act offence involving the wilful failure to establish, implement and maintain a compliant anti-money-laundering programme. He agreed to a $10 million criminal fine and was sentenced to probation.

In March 2025 President Donald Trump granted Delo a full and unconditional pardon.

A pardon does not erase the historical fact of the guilty plea; equally, the offence should not be inflated into allegations that were never proved. Delo has emphasised that the regulatory failing would not have constituted the same crime in the UK.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

8. Delo's Arrival Reinforces a Sector Pattern, Not a Single-Donor Theory

By Q1 2026 Reform's two largest individual donors were both billionaires whose wealth was substantially connected to cryptocurrency: Harborne (£3 million in the quarter) and Delo (£4 million).

Together they supplied about 75% of Reform's private donations in the quarter.

That matters because it converts the crypto overlap from "one donor happens to like crypto" into a concentration issue involving multiple major funders from the same broad economic sector.

The most defensible inference is not that the crypto sector collectively wrote Reform policy. It is that Reform's existing crypto-friendly programme has become exceptionally attractive to wealthy crypto investors, creating a future dependency risk if the party becomes reliant on their continued funding.

9. The Overseas-Donor Rules Triggered an Extraordinary Response

In March 2026 the government announced a £100,000 annual cap on donations and loans from overseas voters, alongside tighter political-finance rules.

Delo was living in Hong Kong when he made his Q1 donations. He subsequently said he intended to move back to Britain so that he could continue contributing millions to Reform.

That is unusually strong evidence of commitment to the political project. Delo is not merely saying he likes Reform; he is prepared to change his country of residence in order to preserve his ability to finance it at scale.

The final legislation and transitional rules remain essential. Returning to Britain does not automatically establish the precise donation treatment that will apply at every point in time.

A SIGNIFICANT GOVERNANCE FACT

When a billionaire says he will relocate internationally so he can continue donating millions to one political party, the democratic significance is not speculative. It demonstrates how valuable continued access to that donor's capital is to the party - and how valuable the ability to fund the party is to the donor. It still does not tell us what, if anything, is expected in return.

10. Delo and Harborne Are Similar - but the Evidence Is Not the Same

Issue	Christopher Harborne	Ben Delo
Relationship duration	Major Farage/Brexit funder since 2019	First disclosed Reform donations in 2026
Direct personal gift to Farage	£5m reported personal gift	None identified
Crypto interest	Tether/Bitfinex minority stake; historic crypto-policy engagement	BitMEX co-founder; crypto-derived fortune
Reform crypto policy timing	Relationship/funding predates 2025 crypto bill	Detailed crypto bill predates disclosed Delo donations
Direct policy advocacy evidence	Farage later lobbied Bank of England on crypto issues aligned with sector	No Delo-to-Reform crypto-policy request identified
Political infrastructure	Longstanding donor access	Sanctuary venue/network plus £4m donation
Best current inference	Stronger donor-policy scrutiny case	Strong self-selection/control case; later influence remains open

11. Does Delo Still Have a Commercial Interest in BitMEX?

Delo's historical wealth and regulatory experience are inseparable from BitMEX, but this report should not assume that his present economic exposure is identical to the position he held as a founder during BitMEX's growth years.

Public reporting in 2026 continues to describe him as a crypto billionaire and BitMEX co-founder, but the precise current ownership, liquidity and structure of his crypto portfolio are not established here.

That uncertainty matters. Policy alignment can be ideological even where the donor no longer has a large direct stake in the original business.

Any claim of measurable personal financial benefit from Reform crypto policy should therefore be tied to current assets rather than Delo's historical biography.

12. His Support for a Crypto-Donation Moratorium Is a Useful Negative Finding

Reporting around Delo's April announcement indicated that he supported the proposed moratorium on cryptocurrency political donations because of the regulatory complexity involved.

That is relevant because it cuts against an easy caricature in which a crypto billionaire necessarily wants every form of crypto deregulation.

His Reform donations themselves were reported as ordinary monetary donations, not cryptocurrency donations.

This again supports a more granular approach: views on crypto trading regulation, AML, stablecoins, taxation and crypto political donations may differ substantially and should not be collapsed into a single "pro-crypto" label.

13. Applying the Seven-Link Influence Ladder

Link	Delo evidence	Assessment
1 - MONEY	£4m in two Q1 2026 donations	STRONG
2 - INTEREST	Crypto-derived fortune; BitMEX founder; regulatory history	STRONG, CURRENT EXPOSURE NEEDS MAPPING
3 - ACCESS	Mega-donor; Farage publicly praises him; Westminster political network/Sanctuary	STRONG
4 - PREFERENCE	Public free-speech/culture/governance views; no specific Reform crypto request identified	DOCUMENTED BROADLY / CRYPTO REQUEST NOT ESTABLISHED
5 - ALIGNMENT	Reform already had strongly pro-crypto policy before his donations	STRONG
6 - OPPORTUNITY	Reform government could reshape crypto taxation/regulation	STRONG SECTOR-WIDE

Link	Delo evidence	Assessment
7 - BENEFIT / INFLUENCE	No evidence Delo caused a Reform crypto policy change or obtained a specific benefit	NOT ESTABLISHED

14. What Delo Actually Proves About Reform

- Reform's crypto-friendly positioning is capable of attracting extremely large donors from the crypto sector independently of Harborne.
- The party's dependence on mega-donors is not solely a Christopher Harborne phenomenon.
- Delo's money materially increases Reform's organisational capacity even without any policy quid pro quo.
- Delo's broader Westminster network shows that wealthy political influence can operate through infrastructure, convening and relationships as well as cash.
- The chronology strongly weakens the claim that Delo created Reform's original 2025 crypto policy because that policy predates his disclosed donations.

15. What Delo Does Not Prove

- That Reform's crypto policy was bought by the crypto industry.
- That Delo asked Farage to deregulate cryptocurrency.
- That his £4 million was conditional on a policy promise.
- That the Sanctuary is a command centre controlling Reform or Restore Britain.
- That his US regulatory offence demonstrates present wrongdoing in Britain.
- That moving back to Britain to continue donating is unlawful.
- That Delo and Harborne coordinate their donations or political objectives.

16. The Most Important Question: What Happened After the First £2m?

The first Delo donation was accepted on 14 January 2026 and the second on 2 March.

That gives the investigation a clean before-and-after window.

We should compare Reform's crypto, free-speech, online-safety, financial-regulation and political-finance positions before 14 January with announcements and interventions afterwards.

We should also identify meetings, dinners, policy groups, conference appearances and Sanctuary events involving Delo and senior Reform figures during that period.

If no donor-specific policy movement appears, Delo becomes powerful evidence for ideological self-selection. If new granular positions appear after documented access or advocacy, the assessment changes.

17. The Evidence That Would Upgrade the Influence Case

- Communications in which Delo asks Reform to change crypto, AML, financial-regulation, online-safety or free-speech policy.
- Internal Reform records identifying Delo as a policy adviser or stakeholder.
- Delo participation in drafting or reviewing legislation or manifesto text.

- A Reform policy change following a documented Delo intervention.
- Meeting records linking Delo with Farage/Tice/Yusuf or policy staff on matters relevant to his current investments.
- Evidence that Sanctuary facilities were used for substantive Reform policy-development sessions involving Delo.
- Current asset records showing a specific commercial benefit from a subsequent Reform policy.

18. The Evidence That Would Strengthen the Self-Selection Explanation

- Reform drafts showing the relevant policies were complete before any Delo contact.
- Delo communications explaining that he selected Reform because of already-published positions.
- No policy meetings or requests despite his large donations.
- Continued Delo support for organisations with conflicting policy positions, consistent with his stated pluralist philanthropy.
- Evidence his current wealth is diversified enough that Reform crypto policy has no distinctive personal financial effect.

SECTION 6.6 VERDICT

Ben Delo is currently stronger evidence for donor self-selection than donor policy capture. Reform's detailed crypto agenda was public months before his first disclosed £2 million donation. His arrival therefore independently confirms that the party's programme attracts enormous sums from wealthy crypto figures.

But Delo's significance should not be understated. He supplied £4 million in three months, built a Westminster political ecosystem, received public praise from Farage for helping Reform prepare for government, and announced an intention to relocate to Britain so he could continue funding the party. The immediate risk is not proven policy purchase; it is concentrated financial and infrastructural dependency on a tiny number of billionaires whose ideological and economic interests overlap with parts of Reform's programme.

Money And Influence: Mapping Reform UK's Donor Network

6.7 Ben Delo: The Network Behind the Money

THE CENTRAL FINDING

Ben Delo's political significance is larger than his £4 million Reform donation. Public evidence shows that, before he became a Reform mega-donor, he had already built a physical and social infrastructure in Westminster: free meeting and office space, podcasting and broadcast facilities, hospitality, events, philanthropy, networking and relationships spanning politicians, activists, academics, think tanks and campaign organisations.

The Sanctuary is therefore best understood as political infrastructure rather than as a covert Reform headquarters. Its users span Reform, Restore Britain, Advance UK, Conservative, Labour-adjacent and non-party organisations, and Delo's wider philanthropy includes mathematics, autism and other non-political causes. But the network is not politically neutral in effect: a substantial part of the ecosystem is organised around free-speech, anti-"woke", populist and hardline migration politics, and Delo has publicly described an ambition to change the broader political and civic "ecosystem".

1. The Network Predates the £4 Million Reform Donation

Delo's political and civic activity did not begin in January 2026 when his first £2 million Reform donation was accepted.

Official parliamentary records show that in October 2020 Ben Delo, via Effective Giving, provided £170,000 that was channelled through The Big Issue to support work associated with crossbench peer Lord John Bird, including staffing and campaign activity. Lord Bird's register also recorded hospitality from Delo and his wife.

This is important disconfirming evidence against the idea that Delo's political involvement was always a covert Reform operation. His documented support predates Reform mega-donor status by more than five years and extended to a crossbench social-enterprise figure whose politics are not reducible to Farageism.

Delo's later Reform support therefore appears to sit inside a pre-existing pattern of using private wealth to fund people, institutions and ideas he considers worthwhile.

A USEFUL NEGATIVE FINDING

Delo did not suddenly invent political philanthropy for Reform. The official parliamentary record shows substantial support for Lord Bird's parliamentary work in 2020. That makes "Delo's entire network exists to advance Reform" an unsustainable conclusion on current evidence.

2. The Sanctuary Is a Real, Physical Political Asset

The most distinctive part of Delo's network is the Sanctuary: a suite of rooms close to Parliament overlooking Westminster Abbey.

The Guardian and Hope Not Hate investigation found that users could receive free event space, office space, catering, podcasting and audio/video production facilities.

Companies House independently confirms that Jeremy Hildreth And Comrades Ltd — run by Jeremy Hildreth, who has provided family-office services to Delo and has been described as an associate or chief-of-staff figure — is registered at the Sanctuary address.

Physical infrastructure matters because political influence is not exercised only through donations. A donor who supplies a venue, production facilities and convening space can lower the cost of organising, broadcasting and connecting political actors without transferring cash directly to them.

Resource provided at/through the Sanctuary	Political value
Meeting/event rooms	Allows organisations to convene supporters, press and policymakers at low or zero venue cost
Office space	Creates persistent organisational capacity close to Parliament
Podcast/video facilities	Reduces media-production cost and increases reach
Catering/hospitality	Facilitates donor, activist and political networking
Prestigious Westminster location	Provides proximity, legitimacy and convenience for political actors
Private social events / after-parties	Creates informal access not captured by formal meeting registers

3. This Is “Capacity Influence” in Its Purest Form

Section 6.1 distinguished policy influence from capacity influence.

The Sanctuary is a near-perfect example of the latter. Delo does not have to tell an organisation what to say for free infrastructure to increase that organisation’s capacity to say it.

The benefit can be especially valuable to newer political organisations and media projects that lack established headquarters, production studios or institutional fundraising.

That does not mean every user owes Delo political loyalty. It means the network changes the resource environment in which particular ideas and organisations operate.

CAPACITY WITHOUT COMMAND

A political patron can exercise influence without issuing instructions. By deciding which organisations receive money, rooms, production facilities, introductions or hospitality, a wealthy individual can alter which voices have resources and which networks become easier to build. That is not the same as controlling the recipients.

4. Restore Britain Is the Most Direct Political-Party Example

Rupert Lowe's Restore Britain used the Sanctuary before Delo's Reform donations became public.

The joint Guardian/Hope Not Hate investigation reports that Lowe was provided free office space for a press conference announcing his mass-deportation policy and that Restore Britain launched its mass-deportation campaign from the Sanctuary.

This is significant for two reasons. First, it shows Delo-linked infrastructure supporting a political project that competes with Reform from the right, undermining the idea that Delo's sole objective is organisational loyalty to Farage.

Second, it demonstrates that Delo's network can support a policy ecosystem as well as a single party: hardline migration proposals were incubated and promoted in a facility funded by someone who would shortly become one of Reform's largest donors.

5. The Restore Timing Requires Legal Precision

Free office or event space can constitute a non-cash political donation or sponsorship where the electoral-finance rules apply and the recipient is a regulated entity.

Electoral Commission guidance requires political parties to account for reportable benefits and values goods or services by their market value.

However, the timing here is legally important. The Guardian reports that Lowe used the Sanctuary for the deportation-policy press conference in November 2025, while Restore Britain was registered as a political party in February 2026.

That means the report should not simply assert that Delo made an undeclared donation to Restore Britain. The regulatory status of the recipient, purpose of the support, date, market value and any relevant non-party or individual-donee rules would all need to be established.

The correct conclusion at this stage is that the in-kind support is a transparency lead requiring classification, not evidence of an electoral-law breach.

NO UNDECLARED-DONATION ALLEGATION

The evidence establishes free use of Delo-funded space by Lowe's project. It does not by itself establish that a reportable donation was unlawfully omitted. The legal status of the recipient at the time, the value of the benefit and the purpose for which it was provided must be resolved first.

6. The Sanctuary Connects Several Competing Right-Wing Political Projects

Delo's venue has hosted or connected figures associated with Reform UK, Restore Britain and Advance UK.

Guests at Delo's 2025 summer event included former Reform deputy leader Ben Habib, who later led Advance UK, as well as Reform-aligned figures Matt Goodwin and James Orr.

The same network has included Rupert Lowe and people supportive of Restore Britain.

This again points toward ecosystem-building rather than straightforward party capture: the infrastructure can strengthen multiple organisations that may compete electorally while sharing cultural or ideological themes.

Political/project connection	Documented Sanctuary/Delo link	Interpretation
Reform UK	Reform-aligned figures at Delo events; Delo later donates £4m to party	Direct party funding plus network access
Restore Britain / Rupert Lowe	Free Sanctuary use for deportation-policy press event/campaign launch	In-kind capacity for a rival party/project
Advance UK / Ben Habib	Habib attended Delo summer gathering	Network connection; no evidence Delo controls Advance
Conservatives / Kemi Badenoch	Personal social contact; Badenoch Triggernometry interview recorded at Sanctuary	Cross-party access
Labour-adjacent / Maurice Glasman	Blue Labour founder attended summer gathering	Evidence network is not exclusively party-right
Non-party civic groups	Civic Future, Academy of Ideas, Free Speech Union, podcasts	Longer-term ecosystem infrastructure

7. Reform's Own Policy Chief Appears in the Network

James Orr, identified in reporting as Reform's head of policy, attended Delo's 2025 summer gathering.

That is an access fact worth recording because policy influence questions are stronger where a donor's network overlaps with people who actually shape party policy.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

The evidential priority is therefore to search for smaller meetings, correspondence, consultation records or repeated contact rather than inflate one party invitation into a policy channel.

8. Delo's Associate Jeremy Hildreth Is a Potential Network Node

Jeremy Hildreth is important because he converts the network from an abstract list of Delo acquaintances into an identifiable organisational node.

The Guardian reports that Hildreth has provided family-office services to Delo and has been described as his chief of staff. Companies House records Jeremy Hildreth And Comrades Ltd at the Sanctuary, with Hildreth as the person holding 75% or more of the shares.

Hildreth also has a documented political-finance history of his own: he provided £26,755 in legal-cost support to Kemi Badenoch in 2021, according to the Guardian investigation.

None of this establishes that Hildreth acts as Delo's political agent in every context. It does make him a sensible name to include in searches for event organisation, introductions, correspondence and policy-network activity.

9. Claire Fox and the Academy of Ideas Form a Longer-Term Ideological Link

The Academy of Ideas, founded by Claire Fox, reportedly uses a room at the Sanctuary.

The Guardian reports that Delo has provided approximately £100,000 a year to support the Academy's Battle of Ideas festival.

Delo used that festival in 2024 to articulate his own political-cultural diagnosis, attacking what he described as the transformation of political correctness into a totalising ideology.

This is stronger evidence of shared ideology than of party-political influence. It shows Delo actively funding a forum and network that promotes debates around free speech, culture-war issues and institutional reform.

10. Free Speech Is the Clearest Organising Principle of the Network

Delo's own website identifies "free enquiry and academic freedom" as one of his central philanthropic themes.

The Sanctuary hosts or supports organisations that define themselves around free expression, including Triggernometry and the Academy of Ideas, while Delo has also said he supports the Free Speech Union.

His public speeches similarly frame political correctness and restrictions on expression as serious institutional problems.

This gives the network an identifiable ideological centre of gravity without requiring the stronger claim that every participant shares the same politics on immigration, abortion, race or economics.

IDEOLOGICAL CENTRE OF GRAVITY

The common denominator is more defensibly described as “free speech / anti-censorship / anti-woke / institutional dissent” than as a single hidden party programme. Some beneficiaries then carry those themes into harder positions on migration, nationalism, abortion or identity.

11. Triggernometry Shows How Infrastructure Becomes Reach

Triggernometry has recorded content at the Sanctuary and has a very large online audience.

Its guest list spans Farage, Jordan Peterson, Benjamin Netanyahu, Kemi Badenoch and others, as well as guests outside the political right.

Providing production space to a high-reach media platform is different from donating to a political party, but it can produce substantial political communications value.

Delo’s lawyers and Triggernometry both stress that such support does not imply editorial control or political affiliation. The report should accept that distinction unless evidence of editorial intervention emerges.

12. Courage Media Connects the Network to Restore’s Harder Edge

Courage Media also records at the Sanctuary.

The Guardian identifies one contributor, Connor Tomlinson, as a supporter of Restore Britain who has advocated highly restrictive immigration positions and the death penalty.

That does not make those positions Delo’s positions. His lawyers explicitly reject the inference that providing facilities constitutes endorsement.

The relevant finding is infrastructural: a Delo-funded venue lowers production costs for voices operating inside the same political ecosystem as Restore Britain.

13. Civic Future Demonstrates Mainstream Institutional Reach

The Sanctuary is also used by Civic Future, founded by former Boris Johnson adviser Munira Mirza and described as a talent pipeline for public life.

Companies House confirms Civic Future as an active UK company.

Its presence matters because it prevents the Sanctuary from being characterised accurately as a purely fringe or extremist facility.

The network can connect campaign activists, commentators and emerging political talent with people who have held senior positions inside mainstream government.

14. Badenoch and Gove Show Access Beyond Reform

Delo’s network reaches senior Conservative figures as well.

The Guardian reports that Kemi Badenoch sat with Delo at the 2023 Spectator awards and later sent him a friendly handwritten note. Her 2025 Triggernometry appearance was recorded at the Sanctuary.

Michael Gove attended Delo's 2025 summer gathering and publicly praised Delo's philanthropic work.

These facts are important controls. They show that Delo's social and political access is not uniquely dependent on Reform and predates his first Reform donation.

15. Lord Bird Is an Even Stronger Cross-Spectrum Control

The official House of Lords register provides the strongest documentary evidence that Delo's political philanthropy has crossed ideological lines.

It records £170,000 received via Effective Giving from Ben Delo in October 2020, used through The Big Issue for staffing and campaigning associated with Lord Bird's parliamentary work.

Lord Bird is a crossbench peer and founder of the Big Issue rather than a figure in Reform's ideological ecosystem.

This does not neutralise the later right-populist network. It demonstrates that Delo's giving history includes substantial social-policy and crossbench support, making a single-purpose partisan explanation inadequate.

16. His Non-Political Philanthropy Is Too Large to Ignore

Delo says he has committed more than £100 million to philanthropy.

His current foundation material lists mathematics education and research, neurodiversity, free enquiry and Commonwealth collaboration as core themes.

In 2026 he committed £25 million to the Sheila Coates Foundation supporting autistic young people and £20 million to the London Institute for Mathematical Sciences.

These activities are directly relevant to motive analysis because they provide evidence that Delo genuinely engages in large-scale philanthropy outside electoral politics.

An investigation that described every grant or facility as disguised political spending would therefore be contradicted by the broader record.

17. "Changing the Ecosystem" Is Still Politically Important

The strongest reason not to dismiss the Sanctuary as ordinary philanthropy is Delo's own stated ambition.

Reporting from inside the network describes discussion of changing the political, academic and civic "ecosystem", and Delo's 2024 Battle of Ideas speech portrayed contemporary political correctness as a systemic threat.

In political-science terms, this resembles long-horizon agenda and capacity building more than transactional lobbying: fund institutions, people and media that make a preferred set of ideas more influential over time.

THE MORE CREDIBLE "LONG GAME"

The evidence does not support a hidden Delo plan to purchase particular Reform policies. It does support a more ordinary and more defensible long-term strategy: use wealth to strengthen people, institutions and media that challenge cultural and political orthodoxies Delo dislikes. Reform is now one major beneficiary of that broader ecosystem.

18. Delo's Reform Donation May Be an Outcome of the Network, Not Its Origin

Section 6.6 established that Reform's detailed crypto platform predates Delo's first disclosed party donation.

Section 6.7 adds that his Westminster networking and ideological philanthropy also predate that donation.

The chronological picture therefore increasingly supports a self-selection model: Delo spent years funding free-speech and institutional-dissent networks, then chose Reform when he concluded it represented the strongest electoral vehicle for his worldview.

That interpretation remains provisional. Evidence of pre-donation policy discussions with Reform could change it.

19. Delo and Harborne: Parallel Donors, But No Proven Coordination

Delo and Christopher Harborne now dominate Reform's private funding and both made fortunes in cryptocurrency-related sectors.

Delo publicly defended Harborne against the government's overseas-donor restrictions, arguing that Labour was particularly antagonised by Harborne and urging wealthy supporters to build a Reform "war chest".

That shows political solidarity and awareness of Harborne's role.

The searches conducted for this chapter have not identified evidence that Delo and Harborne jointly coordinated donations, jointly developed Reform policy, shared a political investment vehicle or operated a common donor strategy.

They should therefore be treated as two highly consequential donors with overlapping sectoral interests unless direct coordination evidence emerges.

NO "CRYPTO CABAL" FINDING

Two crypto billionaires financing the same party is a significant concentration fact. It is not evidence that they are acting together. Coordination requires evidence of communication or common planning, not similarity of wealth or industry.

20. The Move Back to Britain Is Explicitly Political

Delo's proposed relocation from Hong Kong is unusually straightforward in motive because he has said publicly that he intends to move back early so he can continue contributing more money to Reform after the government's overseas-donor cap.

He also urged other wealthy people to contact him and help build a Reform "war chest".

That language places him beyond passive support. He is actively encouraging donor recruitment and presenting himself as part of the party's resource mobilisation.

It remains different from holding a formal Reform office. No evidence reviewed for this chapter establishes that Delo is a party treasurer, officer or policy official.

21. His Network Can Recruit Money as Well as Ideas

A wealthy donor who hosts politicians, writers, campaigners and other wealthy people can become a fundraising node even without formal party status.

Delo's public invitation to other people with "deep pockets" to contact him makes this potential function explicit.

The next stage of the investigation should therefore track not only donations by Delo himself but whether new Reform donors have demonstrable social, professional or event connections to Delo, Hildreth or the Sanctuary.

If several subsequent donors emerge from the same network, the Sanctuary's significance would move from ideological convening toward measurable donor-network mobilisation.

22. The Network Should Be Analysed as a Graph, Not a List

Node type	Examples identified	Next evidential question
Donor	Ben Delo	Who does he introduce or recruit to Reform?
Operational associate	Jeremy Hildreth	Which events, contacts and organisations does he coordinate?
Physical hub	The Sanctuary	Who receives free space and what is its market value?
Political parties/projects	Reform, Restore Britain, Advance-linked figures	What support is cash, in-kind, social or merely attendance?
Policy personnel	James Orr / Reform-aligned policy figures	Are there documented policy discussions?

Node type	Examples identified	Next evidential question
Media	Triggernometry, Courage Media	Does Delo exercise any editorial or commissioning influence?
Ideas organisations	Academy of Ideas, Free Speech Union	What funding is provided and for what programmes?
Talent networks	Civic Future	Does the hub create pipelines into government/party roles?
Mainstream political figures	Badenoch, Gove, Glasman	Is contact social, substantive or recurring?
Other mega-donors	Christopher Harborne	Is there any direct coordination or only parallel support?

23. Applying the Seven-Link Influence Ladder to the Network

Link	Network evidence	Assessment
1 — MONEY	£4m Reform donations; large philanthropy; support to other political/civic actors	STRONG
2 — INTEREST	Free speech, anti-political-correctness, crypto, institutional reform	STRONG / DOCUMENTED
3 — ACCESS	Westminster hub; senior politicians; policy/media figures; recurring events	STRONG
4 — PREFERENCE	Delo publicly advocates free speech, anti-PC institutional change and Reform political success	STRONG GENERAL PREFERENCE

Link	Network evidence	Assessment
5 — ALIGNMENT	Many network users share anti-woke/populist/free-speech themes; Reform aligns strongly	STRONG BUT NON-EXCLUSIVE
6 — OPPORTUNITY	Infrastructure amplifies organisations and may recruit donors/talent	STRONG CAPACITY OPPORTUNITY
7 — BENEFIT / INFLUENCE	No direct evidence Delo dictates Reform policy or controls recipient organisations	NOT ESTABLISHED

26. The Most Important New Investigative Leads

- Create a full Sanctuary event calendar from 2022 onward, identifying organisers, speakers, sponsors and political attendees.
- Identify the legal entity that leases or pays for the Sanctuary premises and the source of those payments.
- Estimate the market value of free office/event/media facilities supplied to political actors where the evidence permits.
- Search Electoral Commission registers for any Delo-related in-kind donations, sponsorship or benefits beyond his £4m cash donations.
- Determine the precise status of Lowe/Restore Britain when the November 2025 Sanctuary support was provided and whether any regulated-donee or campaign rules applied.
- Map Jeremy Hildreth's political contacts, donations, company clients and event-management role.
- Identify all Reform policy officials or candidates who have attended Delo events or used Sanctuary facilities.
- Search for overlap between post-January-2026 Reform donors and the Sanctuary guest/network list.
- Search Delo–Harborne direct communications, joint events or common intermediaries before inferring donor coordination.
- Compare the Sanctuary network with George Cottrell's and Nick Candy's networks to identify shared people or fundraising channels.

SECTION 6.7 VERDICT

Ben Delo is more than a cheque-writer, but the evidence points more strongly to ECOSYSTEM AND CAPACITY INFLUENCE than to direct policy control.

He funds institutions, supplies physical and media infrastructure, hosts networks, encourages wealthy people to finance Reform and has publicly stated a desire to change Britain's political and civic culture. Reform is a major beneficiary of that activity, but not its sole beneficiary and apparently not its origin.

The appropriate verdict is therefore:

STRONG NETWORK / CAPACITY INFLUENCE — NO EVIDENCE OF DIRECT REFORM POLICY CONTROL.

27. Why This Matters Before We Move to Nick Candy

The Delo investigation has identified three distinct forms of donor power that should not be collapsed into one category.

Harborne gives us extraordinary funding concentration, direct personal financial ties to Farage and documented policy-aligned crypto lobbying by Farage.

Delo gives us ecosystem infrastructure: venues, media, events, philanthropy, donor recruitment and ideological networks.

Nick Candy presents a third model: a donor who enters the formal party machine itself as a senior fundraiser.

Part VI can therefore compare three different pathways by which private wealth may matter politically: principal patron, ecosystem builder and institutional insider.

Money And Influence: Mapping Reform UK's Donor Network

6.8 Nick Candy: When a Mega-Donor Becomes Part of the Party Machine

THE CENTRAL FINDING

Nick Candy represents a third and structurally different form of wealthy influence inside Reform UK. Christopher Harborne is the principal patron; Ben Delo is an ecosystem and capacity builder; Candy is both a major donor and a formal party insider charged with finding more major donors.

That combination does not prove that Candy controls policy. It does mean that the usual analytical distinction between "the donor" and "the party" becomes blurred: Candy sits inside the organisation, participates in high-level political and fundraising activity, appears alongside Farage at policy launches, provides access to wealthy networks and has himself supplied about £1 million to the party.

1. From Conservative Donor to Reform Treasurer

Nick Candy entered Reform's formal leadership structure in December 2024 after resigning from the Conservative Party.

He was appointed party treasurer — subsequently described as honorary treasurer — with an explicit remit to raise large sums for Reform.

Candy was not politically unknown before that appointment. He had been a substantial Conservative donor and had relationships across the political and business establishment.

His switch therefore brought Reform more than his own money: it brought an experienced high-net-worth fundraiser and an existing network of wealthy political contacts.

2. Candy Promised to Build a General-Election War Chest

At the time of his appointment Candy promised a seven-figure personal contribution and said he intended to raise tens of millions of pounds for Reform.

Later reporting put his fundraising ambition at roughly £20 million to £40 million before the next general election, with some accounts citing a £25 million to £40 million target.

Those figures matter because Candy's formal function is not simply to donate. His job is to transform Reform's funding base by recruiting other wealthy people.

That makes his access to prospective donors, the terms on which they are cultivated, and any policy discussions accompanying fundraising events legitimate governance questions.

THE GOVERNANCE DISTINCTION

A normal donor gives money to the party. Candy gives money to the party AND occupies the party role responsible for persuading other wealthy people to give money. He is therefore simultaneously financier, fundraiser, gatekeeper and political insider.

3. Candy Eventually Put About £1 Million of His Own Money In

Electoral Commission-derived donation records show Candy contributed approximately £990,000 to Reform during 2025 in several instalments.

That fulfilled, in substance, the seven-figure pledge made when he joined the party, although the money arrived over time rather than immediately.

The scale makes him an important donor in his own right, but he is no longer remotely Reform's dominant financier: Harborne's donations dwarf Candy's personal contribution.

Candy's greater significance is consequently institutional rather than purely numerical.

Candy role	Why it matters
Personal donor (~£1m in 2025)	Creates direct financial stake in Reform's success
Honorary treasurer / senior fundraiser	Places him inside party fundraising governance
High-net-worth networker	Can identify and cultivate prospective mega-donors
Longstanding Farage relationship	Provides personal access beyond formal structures
Former Conservative donor	Connects Reform to an established donor pool
Property developer/investor	Creates identifiable commercial sectors against which policy can be tested
Internationally connected wealthy individual	Relevant to Reform's pitch to mobile capital and wealthy residents

4. The Mayfair Fundraiser Shows the Model in Operation

In early 2025 Reform held a high-end fundraising dinner at Oswald's in Mayfair with tickets reportedly costing up to £25,000.

The event was designed explicitly to attract wealthy donors, including people who had previously supported the Conservatives.

Financial Times reporting said Reform expected the dinner to raise more than £1 million, with approximately 90 guests expected.

This is ordinary lawful political fundraising in form. Its significance to this investigation is that Candy is not merely one name on an Electoral Commission spreadsheet: he helps create the settings in which wealthy people gain direct access to the party leadership.

5. Access Is Part of What High-End Fundraising Sells

Political fundraising dinners do not necessarily sell policy. They do, however, sell proximity: the opportunity to hear from leaders, meet senior party figures and develop relationships unavailable to ordinary supporters.

That distinction should be kept clear. Paying £25,000 to attend a dinner does not establish that a donor purchased a policy outcome.

But repeated high-value events create an access structure in which people able to provide very large sums predictably receive more opportunities for direct contact with senior politicians than the average voter.

Candy's role places him at the centre of that access structure.

ACCESS IS NOT CORRUPTION — BUT IT IS A RESOURCE

The evidential mistake would be to jump from "wealthy donor met Farage" to "wealthy donor bought policy". The equally serious mistake would be to pretend access has no value. Candy's job is precisely to turn relationships with wealthy people into financial support for Reform.

6. The Musk Mission Demonstrates Candy's International Fundraising Reach

Within days of Candy's appointment, he accompanied Farage to meet Elon Musk at Donald Trump's Mar-a-Lago resort in December 2024.

At the time there was intense speculation about whether Musk might provide financial support to Reform, although UK political-finance law sharply constrained the routes through which a foreign individual could lawfully donate.

The meeting did not produce the enormous Musk donation that was speculated about.

Its significance is nevertheless substantial: Candy's formal fundraising role immediately extended into the international billionaire network surrounding Trump and Musk.

7. The Failure of the Musk Donation Is Useful Evidence Too

Not every wealthy contact cultivated by Candy becomes a donor.

The much-publicised Musk relationship is a useful counterexample to any assumption that Candy can simply convert billionaire access into cash.

It also illustrates why public fundraising claims should be separated from accepted Electoral Commission donations. Reform and Candy repeatedly discussed very large prospective sums that had not yet materialised.

For this report, money counts as party funding when it is lawfully received and reportable — not when a fundraiser says somebody may donate.

8. Candy's Fundraising Claims Initially Ran Ahead of the Results

By the first quarter of 2025 Reform's fundraising remained below Labour, the Conservatives and Liberal Democrats despite Candy's predictions of a major influx.

Financial Times reporting in June 2025 described frustration among some senior Reform figures that promised big donations — including Candy's own pledge — had not materialised at the pace suggested publicly.

That is another useful control. Candy's appointment did not instantly transform Reform's finances.

The transformation came later, above all through exceptionally large donations from Christopher Harborne and, in 2026, Ben Delo.

9. Then the Funding Model Changed Dramatically

By late 2025 and 2026 Reform had become extraordinarily well funded, with Harborne providing record sums and Delo joining as another multi-million-pound donor.

Candy remained the senior fundraising figure while these mega-donors entered or expanded their support.

That does not establish Candy recruited either man. Harborne's relationship with Farage and the Brexit Party predates Candy's Reform appointment by years, and Delo's own political ecosystem developed independently.

The correct research question is therefore not "Did Candy create Reform's donors?" but "What role, if any, did Candy play in cultivating, formalising or expanding their later funding?"

10. Harborne Is Particularly Important Because He Predates Candy

Christopher Harborne had already donated more than £10 million to the Brexit Party in 2019 and had an established relationship with Farage long before Candy became treasurer.

Candy therefore cannot plausibly be described as the origin of the Harborne–Farage financial relationship.

However, Harborne's record £9 million Reform donation arrived while Candy was responsible for the party's high-value fundraising operation.

Internal fundraising records, donor-management correspondence and meeting calendars would be needed to establish whether Candy played any role in the size, timing or structuring of those later donations.

11. Candy's Business Background Creates Obvious Policy Tests

Candy made his fortune in luxury property development and investment, particularly in London and international prime real estate.

That creates obvious policy areas for scrutiny: planning, development regulation, property taxation, stamp duty, foreign investment, non-dom/residence taxation and regulation affecting high-value property transactions.

The existence of those interests does not make every Reform housing or tax policy suspicious.

It simply gives the investigation a disciplined test: identify Candy's documented commercial exposure first, then ask whether he advocated a specific Reform policy capable of benefiting it.

12. The Britannia Card Is the Most Visible Candy–Policy Intersection

Candy stood alongside Farage when Reform launched the Britannia Card in June 2025.

The policy was explicitly designed to attract wealthy internationally mobile people to Britain through a £250,000 contribution, ten-year residence rights and preferential tax treatment.

Candy's presence at the launch is politically significant because he is both a wealthy internationally connected businessman and the party figure charged with recruiting wealthy supporters.

But presence at a launch does not establish authorship. No public evidence identified for this chapter shows that Candy designed the £250,000 price, drafted the tax provisions or requested the policy for his own benefit.

POLICY-LAUNCH ACCESS ≠ POLICY AUTHORSHIP

Candy standing beside Farage at the Britannia Card launch is evidence that the party regarded its chief fundraiser as an appropriate public face for a policy aimed at internationally mobile wealthy people. It is not evidence that Candy wrote the policy.

13. Candy's Own International Tax History Makes the Optics Sharper

Public profiles report that Candy moved to Monaco in 2005 for tax reasons before later returning to the UK.

That history makes his association with a policy designed to lure wealthy mobile people through favourable tax treatment especially conspicuous.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

The defensible observation is one of alignment and political optics: Reform's fundraiser has personal experience of the international mobility of wealthy taxpayers that the policy is explicitly designed to address.

14. Candy's Property Assets Also Function as Political Infrastructure

Candy's role overlaps with the Delo model in one interesting respect: property can itself become political infrastructure.

His Chelsea mansion, Providence House, hosted a Donald Trump fundraising event in 2024 attended by Donald Trump Jr.

Guardian reporting also notes that Candy owns offices in Upper Brook Street, Mayfair, where Farage's company Thorn in the Side is based.

Those facts do not establish an improper benefit. They demonstrate that Candy can supply more than cash: prestigious locations and business property can facilitate political meetings, fundraising and organisational activity.

15. The Farage Office Connection Deserves Accounting Clarity

Farage's company being based in offices owned by Candy creates a straightforward transparency question: on what commercial terms is the space occupied?

There may be an entirely ordinary market-rate lease or service arrangement. If so, that substantially resolves the issue.

If office space or services are supplied below market value to Farage personally, his company or Reform, the appropriate disclosure and political-finance rules may become relevant depending on the recipient and purpose.

No allegation should be made without the lease, invoices or other evidence of the terms.

A DOCUMENT REQUEST, NOT AN ALLEGATION

The useful evidence here would be mundane: lease, rent, service charge, payer and market comparison. Until those are known, the office address is a transparency lead rather than evidence of an undeclared benefit.

16. Candy's Network Extends Beyond Reform

Like Delo, Candy cannot be understood solely through Reform.

He was a Conservative donor, has longstanding relationships with figures including Boris Johnson, and has moved in international political circles involving Trump and Musk.

His property and business networks are global rather than party-specific.

This weakens any simplistic claim that his wealth or contacts exist to serve Reform, while simultaneously explaining why Reform considered him valuable as a fundraiser.

17. Targeting Low-Tax Jurisdictions Is Particularly Relevant

In 2025 Candy publicly discussed targeting high-net-worth individuals in Britain and in low-tax jurisdictions for Reform fundraising.

That is consistent with the party's effort to attract wealthy internationally mobile supporters and with the Britannia Card's political narrative.

Again, donor recruitment and tax policy can share a target demographic without one causing the other.

The evidential question is whether fundraising conversations with those individuals also became policy-consultation channels.

18. A Treasurer Has Governance Responsibilities as Well as Fundraising Value

The title "treasurer" carries an obvious public expectation of financial governance, although the precise legal responsibilities depend on Reform's internal constitution and the registered statutory roles under electoral law.

This report should therefore distinguish Candy's honorary/party title from the legally registered party treasurer or responsible officers at any particular date.

The important point is functional: Reform publicly presents Candy as a senior fundraising figure and he speaks publicly about the party's donor strategy.

Future investigation should identify which decisions Candy can formally approve, what donor due diligence he sees, and where responsibility sits for permissibility checks and reporting.

19. The £100,000 Design-Firm Donation Illustrates the Due-Diligence Question

In June 2025 Reform accepted £100,000 from Interior Architecture Landscape, a design and architecture firm that had faced an HMRC winding-up petition earlier that year.

It does, however, illustrate why a party aggressively expanding high-value fundraising needs robust donor due diligence as well as legal permissibility checks.

The governance question is not merely "Can we legally accept this money?" but also "What reputational, source-of-funds and conflict risks should a prospective governing party examine?"

20. Candy's Success Should Be Measured Against Accepted Donations, Not Headlines

Candy's first months produced more publicity than money. Later, Reform's fundraising performance became extraordinary.

The report should resist attributing that entire improvement to Candy without evidence.

Harborne was already a Farage financier; Delo has his own ideological network; JCB and other donors have histories with the Conservatives; and Reform's polling success itself makes the party more attractive to donors.

Candy may be an important accelerator and connector, but causation should be assigned donor by donor.

21. Applying the Seven-Link Influence Ladder to Candy

Link	Candy evidence	Assessment
1 — MONEY	Approximately £990,000 personal donations in 2025	STRONG

Link	Candy evidence	Assessment
2 — INTEREST	Property, investment, high-net-worth taxation and internationally mobile capital	STRONG / IDENTIFIABLE
3 — ACCESS	Formal fundraising role; close Farage relationship; policy launches; billionaire networks	VERY STRONG
4 — PREFERENCE	Publicly advocates Reform and actively recruits wealthy donors	STRONG POLITICAL PREFERENCE
5 — ALIGNMENT	Britannia Card, lower-tax/deregulatory agenda and wealth-creator rhetoric align broadly with his milieu	STRONG GENERAL ALIGNMENT
6 — OPPORTUNITY	Can connect donors to leadership and participate in fundraising strategy	VERY STRONG
7 — POLICY CONTROL / PERSONAL BENEFIT	No evidence identified that Candy dictated a specific Reform policy for commercial benefit	NOT ESTABLISHED

22. Candy Creates a Conflict-of-Interest Risk Even Without Misconduct

A conflict-of-interest risk is not the same as an actual conflict or corrupt act.

Candy's structural position creates the risk because he simultaneously has substantial private business interests, donates heavily, recruits other wealthy donors and occupies a senior position close to the party leadership.

If Reform were to develop detailed planning, property-tax or investment policies after consultation with Candy, the party should be able to demonstrate how conflicts were identified and managed.

The governance safeguard is transparency: declarations of interests, consultation records, recusals where appropriate and clear separation between fundraising and policy formation.

THE REAL GOVERNANCE TEST

The question is not "Is Nick Candy rich?" or even "Does Reform have policies rich people like?" The serious question is whether Reform has institutional safeguards preventing its chief fundraiser's donor relationships and private commercial interests from becoming privileged policy channels.

23. Candy, Delo and Harborne Now Form Three Distinct Models

Figure	Primary form of influence identified	Strongest evidence	What remains unproved
Christopher Harborne	Principal patron / concentrated finance	Extraordinary party funding, £5m Farage gift, sector-policy overlap, Farage crypto lobbying	Harborne caused or purchased policy
Ben Delo	Ecosystem / capacity builder	Sanctuary infrastructure, philanthropy, networking, donor mobilisation, £4m donations	Direct Reform policy control
Nick Candy	Institutional insider / fundraiser	Formal party role, personal donations, HNW recruitment, policy-launch and billionaire access	Commercial-policy capture or donor quid pro quo

24. What We Can Say Safely

- Candy is both a major Reform donor and a senior party fundraising figure.
- He has supplied approximately £1 million personally and has publicly sought tens of millions more from wealthy supporters.
- He has direct access to Farage and international billionaire networks.
- He accompanied Farage to the Musk meeting and stood with him at the Britannia Card launch.
- His property and investment background creates identifiable sectors in which future Reform policy should be tested for conflicts or donor input.
- His role makes donor due diligence, fundraising-policy separation and declarations of interests legitimate governance questions.
- No public evidence identified here establishes that Candy purchased, dictated or secretly authored a Reform policy.

25. What We Cannot Say

- That Candy controls Reform because he is its fundraiser.
- That Harborne or Delo donated because Candy instructed them to.
- That the Britannia Card was created for Candy or written by him.
- That Candy's office/property arrangements with Farage constitute an undeclared donation.
- That Reform's planning or property policies were designed to benefit Candy's developments.
- That the Musk meeting involved an unlawful donation arrangement.
- That every prospective donor Candy meets receives policy access.

26. The Documents That Would Decide the Harder Questions

- Reform's constitution and current allocation of financial/fundraising responsibilities.
- Candy's appointment terms and any conflict-of-interest policy applying to him.
- Major-donor due-diligence procedures and records, appropriately redacted for personal data.
- Donor-event guest lists and records of substantive policy meetings arising from fundraising events.
- Correspondence between Candy and Harborne, Delo, Grainger, Bamford and other major donors concerning Reform funding.
- Records identifying whether Candy participated in drafting or consultation on the Britannia Card.
- Records of Candy participation in housing, planning, property-tax or investment policy discussions.
- The commercial terms for Farage/Thorn in the Side's use of Candy-owned Mayfair offices.
- Any declared in-kind provision of Candy property, hospitality or services to Reform or Farage.
- Internal records showing which donors Candy personally recruited and when.

27. A Better Measure of Candy's Influence: Network Conversion

Candy's performance can eventually be tested empirically.

Construct a list of people and companies he publicly or privately cultivated after December 2024; then compare it with subsequent Electoral Commission donations.

That would allow the report to distinguish claimed fundraising from actual network conversion.

If a large proportion of Reform's new high-value donors can be traced through Candy's events or introductions, his importance becomes measurable without making any allegation about policy purchase.

28. The Policy Question Should Come After the Fundraising Map

The safest investigative order is: donor recruitment first, policy interaction second.

Once Candy-linked donors are identified, their business interests can be compared with Reform policies and consultation records.

This prevents reverse-engineering suspicion from policy outcomes and looking for any businessman who might benefit.

It also lets the report identify negative cases — donors who gave large sums despite receiving no obvious policy alignment — which are essential to testing the influence hypothesis honestly.

SECTION 6.8 VERDICT

Nick Candy presents the clearest governance problem in Part VI because private wealth and formal party machinery occupy the same person. His influence is not principally the size of his own donation. It is his institutional position between Reform's leadership and the wealthy people the party wants to recruit.

The evidence supports:

MAJOR DONOR + FORMAL FUNDRAISING INSIDER + EXCEPTIONAL ACCESS + IDENTIFIABLE COMMERCIAL INTERESTS.

It does NOT presently support:

PROOF OF POLICY PURCHASE, COMMERCIAL FAVOUR OR QUID PRO QUO.

The appropriate scrutiny is therefore institutional: how does Reform separate fundraising access from policy formation, manage conflicts and document donor due diligence?

Money And Influence: Mapping Reform UK's Donor Network

6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

THE CENTRAL FINDING

Nick Candy can be shown to have converted at least part of his wealthy contact book into Reform money. The clearest documented cases are Bassim Haidar and Mohamed Amersi: both attended the £25,000-a-head January 2025 fundraiser organised by Candy and Farage, and both subsequently appear in Electoral Commission donation records. Haidar later became a substantial repeat donor; Amersi's recorded Reform donation was the £25,000 connected with that event.

Beyond those cases, the evidence becomes much weaker. Several of Reform's largest later donors — especially Christopher Harborne — plainly predate Candy. Ben Delo developed his own political ecosystem. David Grainger, Johan Christofferson, R20/Robert Tchenguiz, Greybull, JCB/Bamford and other donors entered during Candy's tenure, but public evidence reviewed here does not establish that Candy personally recruited them. Fiona Cottrell also predates Candy as the registered donor, but her donations must now be treated separately because the reported economic source of funds is under active investigation.

The result is therefore mixed: CANDY HAS A DOCUMENTED CONVERSION RECORD, BUT HE CANNOT YET BE CREDITED WITH BUILDING REFORM'S ENTIRE MEGA-DONOR NETWORK.

1. The Test: Stop Taking the Fundraiser's Word for It

Candy repeatedly said he would use his contacts to raise tens of millions of pounds for Reform. That claim can now be tested against accepted donations rather than publicity.

The appropriate evidential chain is deliberately demanding: a donor should be attributed to Candy only where there is public evidence of a prior Candy relationship, a Candy-organised event, a documented introduction or an explicit statement that Candy recruited the donor.

Simply donating after December 2024 is not enough. Candy was treasurer during a period when Reform rose sharply in the polls, became electorally credible and attracted wealthy people for reasons entirely independent of him.

This section therefore separates DOCUMENTED CANDY CONVERSION from PLAUSIBLE CANDY-ERA RECRUITMENT and NO IDENTIFIED CANDY LINK.

2. The January 2025 Oswald's Dinner Gives Us the Cleanest Starting Cohort

On 28 January 2025 Reform held a major fundraiser at Oswald's in Mayfair, organised by Nigel Farage and Nick Candy.

Tickets reportedly cost £10,000 for ordinary seats and £25,000 for places at the top table with Farage. Reporting said pledges at the event exceeded £1 million.

The guest list included several wealthy business figures and former Conservative donors, giving us a defined cohort against which later Electoral Commission records can be tested.

Two attendees are especially useful because their financial relationship with Reform can be followed directly: Bassim Haidar and Mohamed Amersi.

3. Mohamed Amersi: A Direct Event-to-Donation Conversion

Mohamed Amersi was a substantial former Conservative donor before attending Candy and Farage's fundraiser.

Electoral Commission records show Reform accepted £25,000 from Amersi on 27 January 2025, matching the reported price of a top-table ticket and the timing of the Oswald's event.

The Guardian confirmed that Amersi paid £25,000 to attend and subsequently described the atmosphere positively, while also making clear that his political giving was not exclusively Reform-oriented.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

CASE 1 — AMERSI

DOCUMENTED: Candy/Farage fundraiser attendee → £25,000 accepted by Reform.

NOT DOCUMENTED: a larger subsequent Reform funding relationship or Candy-mediated policy influence.

4. Bassim Haidar: The Strongest Evidence That Candy Converted a Tory Donor

Bassim Haidar is the clearest success case in Candy's donor-recruitment story.

Haidar had previously donated heavily to the Conservatives. He attended the January 2025 Oswald's fundraiser, paying £25,000, and publicly praised Candy's presence and Reform's pro-business pitch.

By April 2025 Haidar publicly announced that he had defected from the Conservatives to Reform and pledged £1 million.

Financial Times reporting in June showed that the pledge was arriving more slowly than advertised: Haidar had then provided about £250,000 of the promised £1 million. Later Electoral Commission-based reporting recorded further six-figure support.

CASE 2 — HAIDAR

STRONG DOCUMENTED CONVERSION: former Tory donor → Candy/Farage £25k fundraiser → public defection to Reform → £1m pledge → substantial accepted donations.

This is currently the strongest public example supporting Candy's claim that he could move Conservative donor money toward Reform.

5. The Guardian's Reporting Explicitly Attributes Donors to Candy's Contact Book

A February 2025 Guardian investigation into Reform's internal operation went further than merely noting Candy's title.

It reported that Tory donors including Bassim Haidar and Mohamed Amersi had "come through his contact book".

That is valuable attribution because it comes from reporting about how Reform's fundraising operation was working at the time, rather than being inferred retrospectively from donation dates.

It supports the conclusion that Candy had begun doing exactly what Reform hired him to do: converting parts of his established high-net-worth network into party access and at least some party income.

6. But the January Dinner Did Not Produce a Visible £1 Million Cash Windfall

Contemporary reports said more than £1 million had been pledged at the dinner. Pledges and accepted donations are not the same thing.

The first-quarter Electoral Commission return shows Reform still depended heavily on existing/internal funding and historic loan conversions, with only a modest amount of genuinely new cash compared with the fundraising rhetoric.

Financial Times analysis later concluded that Reform received only a little over £840,000 in new cash donations in Q1 once Richard Tice loan conversions were removed from the headline figure.

That gap is crucial. Candy demonstrated access to wealthy people immediately; converting all of that enthusiasm into banked, reportable money took much longer.

7. Candy's First Six Months Were More Promise Than Conversion

By June 2025 senior Reform figures were reportedly frustrated that Candy's repeatedly promised seven-figure personal donation had not yet been fully paid and that other large pledges had also arrived slowly.

The Financial Times reported that Candy had donated about £313,000 at that point, while Haidar had supplied about £250,000 of his £1 million pledge.

Candy's spokesperson argued that he had been instrumental in attracting new money and that Reform was achieving record fundraising results.

Both things can be true: Candy could be creating a valuable donor pipeline while simultaneously overstating how quickly pledges would convert into cash.

PLEDGE ≠ DONATION

For this investigation, "Candy raised £X" should never be taken from a press quote alone. The defensible measure is accepted Electoral Commission donations, supplemented by documented in-kind support. Announced pledges remain a separate category until the money arrives.

8. Q2 2025 Shows a Genuine Former-Tory Donor Migration

By the second quarter of 2025 the pattern became clearer.

Electoral Commission-based reporting identified almost £1 million arriving from former Conservative donors, including Candy himself, Bassim Haidar, Johan Christofferson and R20, an investment vehicle linked to Robert Tchenguiz.

Greybull Capital also gave £100,000, while other business donors entered the register.

This is consistent with Candy's stated strategy of raiding the Conservative donor base. But consistency is not attribution: only Haidar and Amersi currently have a clear public trail through Candy's own contact book or fundraiser.

9. Johan Christofferson: Candy-Era Recruit, Personal Candy Link Not Established

Johan Christofferson gave Reform £100,000 in 2025 after previously donating to Boris Johnson.

That makes him a textbook example of the donor population Candy said he was targeting: wealthy former Conservative supporters willing to consider Reform.

However, the searches conducted for this section did not locate reliable public evidence that Candy personally introduced Christofferson to Reform or that Christofferson attended a Candy fundraiser before donating.

He should therefore be classified as PLAUSIBLE CANDY-ERA RECRUITMENT, NOT DOCUMENTED CANDY CONVERSION.

10. R20 / Robert Tchenguiz: Same Problem, Same Discipline

R20, an investment vehicle linked to property tycoon Robert Tchenguiz, gave Reform £50,000 after previously being associated with Conservative political funding.

Tchenguiz operates in a social and commercial world that plausibly overlaps with Candy's property and high-net-worth network.

Plausibility is not evidence. No reliable public source located for this section establishes that Candy solicited the R20 donation, hosted Tchenguiz for Reform or introduced him to Farage.

R20 therefore remains an UNATTRIBUTED FORMER-TORY DONOR unless stronger evidence emerges.

11. Greybull Capital: New Money During Candy's Tenure, No Recruitment Trail

Greybull Capital donated £100,000 to Reform in 2025.

The firm's history makes it an important donor for policy-conflict analysis, particularly around industrial policy and British Steel, but that is separate from the recruitment question.

No public evidence located here connects the donation to Candy's personal network or fundraising events.

It should not be added to Candy's "scorecard" simply because he was treasurer when the cheque arrived.

12. JCB / Bamford: A Major Tory Donor Moves Partly Toward Reform

JCB-linked interests gave £200,000 to Reform in late 2025 while also giving £200,000 to the Conservatives.

Anthony Bamford is one of Britain's best-known Conservative donors and a longstanding Brexit supporter, making Reform an ideologically unsurprising destination for at least part of his political giving.

No reliable public evidence located for this section establishes Candy as the person who recruited Bamford.

The split donation is particularly important because it looks more like hedging across the political right than a clean Candy-engineered defection.

13. Harborne: Candy Cannot Claim the Party's Biggest Donor

Christopher Harborne is the decisive negative control.

His financial relationship with Farage's political projects began years before Candy joined Reform: he made multimillion-pound donations to the Brexit Party in 2019 and maintained a direct relationship with Farage thereafter.

Harborne's £9 million Reform donation in 2025 occurred during Candy's tenure, but timing cannot turn a pre-existing Farage patron into a Candy recruit.

Unless internal evidence shows Candy materially increased or negotiated the later donation, Harborne belongs in the PRE-EXISTING FARAGE NETWORK category.

14. Fiona Cottrell: Registered Donor, Source of Funds Under Active Investigation

Fiona Cottrell's name appears in Electoral Commission records as a substantial Reform donor before Candy became treasurer, so in the narrow registration chronology she predates Candy.

However, recent reporting materially changes how this report should classify her. George Cottrell reportedly transferred more than $2 million to his mother shortly before major payments connected with Reform, and the source and permissibility of the relevant political donations are now subject to active scrutiny.

Accordingly, Fiona should not be treated analytically as a straightforward independent wealthy donor whose personal fortune funded Reform. The correct designation is REGISTERED DONOR / REPORTED ECONOMIC SOURCE OF FUNDS UNDER ACTIVE INVESTIGATION.

This correction also means she should not be used as a clean negative control for Candy recruitment. The Cottrell money trail requires a dedicated section distinguishing registered donor, bank-account sender, reported underlying source and legally determined donor.

15. Ben Delo: A Parallel Recruitment System, Not an Obvious Candy Product

Sections 6.6 and 6.7 showed that Ben Delo had built his own Westminster political ecosystem before becoming a £4 million Reform donor in 2026.

His Sanctuary network, ideological philanthropy and public statements provide an independent pathway into Reform.

No reliable evidence located for this section establishes that Candy introduced Delo to Farage or recruited his donations.

Delo should therefore remain classified as INDEPENDENT / NO CANDY LINK ESTABLISHED unless correspondence or meeting records demonstrate otherwise.

16. David Grainger: Major New Donor, Attribution Unknown

Biotech and life-sciences investor David Grainger emerged as another very large Reform donor in 2026, contributing about £1 million in the first quarter.

That makes him exactly the kind of donor Candy's operation was trying to attract: wealthy, commercially sophisticated and new to Reform's top tier.

But current public reporting identifies the donation without identifying Candy as recruiter or intermediary.

Grainger is therefore a HIGH-PRIORITY ATTRIBUTION LEAD, not a Candy success that can presently be claimed as fact.

17. The Emerging Classification

Donor / source	Reform money identified	Pre-Candy relationship?	Documented Candy link?	Current classification
Bassim Haidar	£25k dinner; later substantial repeat donations; £1m pledge	Conservative donor, not Reform	YES — Candy/Farage fundraiser; reported through Candy contact book	STRONG CANDY CONVERSION
Mohamed Amersi	£25,000	Conservative donor	YES — Candy/Farage fundraiser; reported through Candy contact book	DOCUMENTED LIMITED CONVERSION

Donor / source	Reform money identified	Pre-Candy relationship?	Documented Candy link?	Current classification
Christopher Harborne	£12m in 2025; earlier Brexit Party millions	YES — longstanding Farage/Brexit Party patron	No recruitment evidence found	PRE-EXISTING FARAGE NETWORK
Fiona Cottrell	Registered £500k in 2024 plus later payments	Registered donor predates Candy; underlying source now disputed/investigated	No Candy recruitment evidence found	REGISTERED DONOR / SOURCE OF FUNDS UNDER INVESTIGATION
Ben Delo	£4m in Q1 2026	Independent political network predates donations	No recruitment evidence found	INDEPENDENT / UNATTRIBUTED
David Grainger	~£1m Q1 2026	No major Reform funding identified here before Candy	No public Candy link found	NEW DONOR — ATTRIBUTION UNKNOWN
Johan Christofferson	£100k in 2025	Former Boris Johnson donor	No public Candy link found	PLAUSIBLE CANDY-ERA / UNPROVED
R20 / Robert Tchenguiz	£50k in 2025	Former Tory-linked donor	No public Candy link found	PLAUSIBLE CANDY-ERA / UNPROVED
Greybull Capital	£100k in 2025	No Candy recruitment established	No public Candy link found	NEW BUSINESS DONOR — UNATTRIBUTED
JCB / Bamford	£200k to Reform in late 2025	Longstanding Tory/Brexit network	No public Candy recruitment evidence found	CROSS-PARTY HEDGING / UNATTRIBUTED

18. What Candy Can Fairly Take Credit For

- Creating high-end fundraising events that brought former Conservative donors into direct contact with Farage and Reform's senior team.

- Demonstrably bringing Haidar and Amersi through his contact book to the January 2025 fundraiser.
- Helping establish Reform as a credible destination for wealthy former Conservative donors.
- Building a fundraising operation that, together with Reform's polling rise and Farage's existing networks, eventually coincided with a dramatic increase in private funding.
- Normalising a more American-style model of explicit high-value donor cultivation inside Reform.

19. What Candy Cannot Fairly Take Credit For — Yet

- Creating the Harborne relationship.
- Treating Fiona Cottrell as a clean independent recruit; the source-of-funds issue now requires separate analysis.
- Recruiting Ben Delo.
- Recruiting David Grainger.
- Recruiting JCB/Bamford.
- Recruiting Johan Christofferson, R20/Tchenguiz or Greybull without further evidence.
- Personally causing Reform's entire 2025–26 fundraising surge.

THE SCORECARD SO FAR

CLEARLY DOCUMENTED CANDY CONVERSIONS: 2 named cases (Haidar and Amersi), with Haidar developing into the materially important repeat donor.

LARGE DONOR CLEARLY PRE-DATING CANDY: Harborne.

FIONA COTTRELL: registered donor relationship predates Candy, but should no longer be treated as an independent donor node because the reported source of funds is under active investigation.

MAJOR/NOTABLE LATER DONORS WITH NO PUBLIC CANDY RECRUITMENT EVIDENCE LOCATED: Delo, Grainger, Christofferson, R20/Tchenguiz, Greybull and Bamford/JCB.

That is enough to prove Candy's contact book works. It is not enough to prove he built the machine.

20. Haidar Is More Important Than the Raw Donation Total

Haidar demonstrates a mechanism rather than merely a sum.

Candy's stated strategy was to persuade disaffected Conservative donors that Reform was becoming the credible pro-business party of the right.

Haidar moved through precisely that sequence: Conservative financier, Candy/Farage fundraiser attendee, public praise for Reform's business direction, formal defection and substantial financial commitment.

21. Amersi Shows the Limits of Access Conversion

Amersi illustrates the opposite point.

Wealthy attendees can therefore sample Reform, meet Farage and Candy, and still remain politically non-exclusive or decline to become major donors.

That weakens any theory that a £25,000 dinner seat automatically creates donor loyalty or policy capture.

22. Reform's Polling Success Is a Major Confounder

Candy's fundraising operation cannot be evaluated in isolation from Reform's electoral rise.

As Reform became competitive in national polling and won local representation, donating to it became more politically consequential and therefore more attractive to people who wanted influence over the future of the British right.

Some donors may have moved because Candy called them; others because the Conservatives weakened; others because of Farage personally; others because of Brexit, tax, net zero, crypto or immigration policy.

Any serious attribution model must therefore avoid treating "donated while Candy was treasurer" as evidence of Candy causation.

23. Candy's Real Achievement May Be Market-Making

The evidence suggests Candy's most important contribution may not be personally recruiting every donor.

By hosting expensive, prestigious events and publicly promising a professional war chest, he helped signal to wealthy people that Reform had become a legitimate vehicle for large-scale political investment.

That can create a market effect: donors who never met Candy may become more willing to give because other wealthy people are visibly doing so and the party appears financially viable.

This form of influence is difficult to quantify, but it is distinct from falsely attributing individual donations to Candy.

24. The Fundraising Team Is Broader Than Candy

By 2026 reporting described Reform's strengthened fundraising operation as being led by Candy alongside Charlton Edwards.

Farage himself remains the party's most important political draw and personally possesses donor relationships that predate Candy by many years.

Zia Yusuf, Richard Tice and other senior figures have also financed or facilitated the party at different stages.

The appropriate institutional unit is therefore the Reform fundraising operation, with Candy as a central node — not a one-man donor machine.

25. A Stronger Test: Introductions Rather Than Social Proximity

The next evidential threshold should be a documented introduction.

Photographs from the same dinner, membership of the same club or participation in London property circles are too weak to attribute recruitment.

Useful evidence would include donor statements saying Candy approached them, Candy publicly naming people he recruited, correspondence, guest lists showing first contact, or contemporaneous reporting from people involved in the fundraising process.

This threshold should be applied consistently even where a suspected Candy link appears intuitively obvious.

26. Applying an Attribution Scale

Level	Evidence required	Example in current evidence
A — Documented recruitment	Explicit source says donor came through Candy / Candy solicited donor	Haidar; Amersi
B — Documented Candy event before/at first donation	Named attendee at Candy-organised fundraising event	Haidar; Amersi
C — Strong network overlap	Established personal/business relationship but no recruitment statement	None upgraded solely on this basis
D — Candy-era donor	Donation begins after Candy appointment; no link found	Grainger, Christofferson, R20, Greybull
E — Pre-existing network	Donor relationship predates Candy	Harborne
F — Source-of-funds unresolved	Registered donor predates Candy but economic source is contested/investigated	Fiona Cottrell
G — Independent pathway	Evidence points to another political network or motive	Delo currently best fits this category

27. The Unexpected Result: Candy Is Important Without Owning the Biggest Cheques

The largest donations do not currently map neatly onto Candy's contact book.

Harborne is fundamentally Farage's pre-existing patron. Delo appears to have arrived through his own ideological and political trajectory. Grainger remains unattributed.

Candy's documented contribution is instead strongest in the migration of conventional Conservative donor-class money toward Reform.

That makes him less the creator of Reform's billionaire patrons than the bridge between Reform and the established British centre-right donor establishment.

A BETTER DESCRIPTION OF CANDY

On current evidence, Nick Candy is best described as REFORM'S BRIDGE INTO THE TRADITIONAL CONSERVATIVE HIGH-NET-WORTH DONOR CLASS — not the originator of every mega-donor now financing the party.

28. Why This Matters for the Influence Investigation

The distinction changes what we should investigate next.

For Harborne and Delo, the relevant questions are direct access, sector interests and independent political networks.

For Candy-linked donors such as Haidar, the question becomes whether fundraising access developed into policy access after the financial relationship was established.

For Fiona and George Cottrell, the priority is different again: establish the economic source and legal route of the money before using the registered donor identity in any influence analysis.

For unattributed donors such as Grainger, we should first identify the recruitment channel before attempting to infer any Candy-mediated influence.

29. What Would Upgrade Candy's Score Dramatically?

- Internal donor CRM records showing Candy as recruiter/referrer for later six- and seven-figure donors.
- Emails in which Candy solicits Harborne, Delo, Grainger, Bamford, Christofferson or Tchenguiz on Reform's behalf.
- Guest lists showing a donor's first Reform contact occurred at a Candy event, followed by a later major donation.
- Donor interviews explicitly crediting Candy with persuading them to switch or give.
- Candy correspondence promising or arranging policy meetings as part of donor cultivation.
- Records showing Candy introduced donors directly to relevant Reform policy officials after donations.

30. What Would Weaken the Candy Thesis?

- Evidence that most large donors approached Reform independently.
- Direct donor statements crediting Farage, policy alignment or other intermediaries rather than Candy.
- Internal records showing Candy had little involvement with Harborne, Delo, Grainger and other major donors.
- Evidence that Candy's fundraising role was largely representational while professional staff handled recruitment.

- Continued concentration of funding among pre-existing Farage relationships rather than Candy-recruited donors.

SECTION 6.9 VERDICT

The empirical test gives Nick Candy a real but narrower fundraising achievement than the public rhetoric initially implied.

He can be directly connected to the recruitment environment that brought Bassim Haidar and Mohamed Amersi into Reform's donor orbit, and contemporary reporting explicitly says those Tory donors came through his contact book. Haidar then became a substantial repeat donor, making him the strongest documented Candy conversion.

But Reform's biggest financial relationships do not currently belong to Candy. Harborne predates him; Fiona Cottrell now requires separate source-of-funds treatment; Delo has an independent pathway; and no public recruitment trail has yet been established for several later major donors.

The appropriate verdict is:

DOCUMENTED DONOR CONVERSION + SUCCESSFUL TORY-DONOR BRIDGE — NOT PROVEN ARCHITECT OF REFORM'S ENTIRE MEGA-DONOR NETWORK.

Money And Influence: Mapping Reform UK's Donor Network

6.10 Bassim Haidar: The Candy Conversion Case

THE CENTRAL FINDING

Bassim Haidar is the strongest publicly documented example of Nick Candy converting a wealthy Conservative donor into a Reform financier — and, unusually, Haidar himself has told us what he wanted politically. His defection was explicitly tied to pro-business policy, immigration, investment and, most importantly for this investigation, the abolition of the old non-dom regime.

Before backing Reform, Haidar publicly warned that ending non-dom treatment would cost him "millions and millions" each year and said he planned to leave Britain for Monaco or Dubai. When he later pledged £1 million to Reform, he said he believed Nigel Farage would reform tax, encourage investment and perhaps create a new non-dom regime.

This is therefore not an inferred donor-policy overlap. It is a DOCUMENTED DONOR POLICY PREFERENCE followed by a major political funding commitment. What remains unproved is the crucial final step: that Haidar obtained, negotiated or caused Reform's later Britannia Card policy.

1. Where Haidar's Wealth Comes From

Haidar is a Nigerian-born Lebanese entrepreneur whose fortune was built primarily in telecommunications, technology, fintech, logistics and infrastructure across Africa and the Middle East.

He co-founded Intercomm in 1991 and GMT in 1995, then founded Channel IT in 2003 to supply and service the Nigerian telecommunications sector.

He later founded Channel VAS, now associated with Optasia, providing mobile financial and fintech services across emerging markets.

His wider portfolio includes venture capital through Knuru, energy/infrastructure interests and medicinal-cannabis business SafriCanna.

BH Holdings describes a multi-sector group with revenues exceeding $1.6 billion. Public descriptions of Haidar's personal wealth vary substantially, so this report does not adopt an unsupported precise net-worth figure.

Business area	Documented Haidar exposure	Potential Reform-policy relevance
Telecoms / infrastructure	Channel IT; African/Middle East infrastructure and services	Business regulation, investment, trade
Fintech / mobile finance	Channel VAS / Optasia; financial inclusion and credit technology	Financial regulation, fintech, investment
Venture capital	Knuru Capital	Capital gains, investment taxation, regulation
Energy / engineering	Channel group interests	Energy/infrastructure policy
Medicinal cannabis	SafriCanna	Life sciences, clinical/regulatory environment
Property / personal assets	Reported substantial UK property holdings	Property tax, residence, inheritance tax
International income / investments	Businesses and wealth generated largely abroad	Non-dom/FIG/Britannia Card directly relevant

2. He Was Already a Major Conservative Donor

Before moving to Reform, Haidar was one of the Conservatives' substantial recent donors.

Contemporary reporting put his Conservative support at more than £700,000 during the Rishi Sunak period, while Electoral Commission-derived datasets record more than £600,000 in party donations plus other regulated political support.

His political funding therefore did not begin with Farage and should not be interpreted as evidence of a longstanding Reform ideological commitment.

The useful question is what caused an established Conservative donor to change political vehicle.

3. The Non-Dom Decision Was a Documented Breaking Point

In May 2024 — long before his Reform pledge — Haidar gave an unusually candid interview about the proposed abolition of the non-dom regime.

He said the change would expose his overseas income to UK taxation and cost him millions each year.

He announced that he was leaving Britain and considering Monaco and Dubai, explicitly contrasting UK taxation with jurisdictions offering very low or zero personal taxation.

He also said he had assembled a working group of 29 non-doms, many of whom were planning to leave.

This provides unusually strong evidence of a specific policy preference existing before his Reform relationship deepened.

THE POLICY PREFERENCE PREDATES THE REFORM MONEY

Haidar did not discover non-dom taxation after becoming a Reform donor. He was publicly campaigning against the change in 2024, while still associated with Conservative funding. That chronology strongly supports donor self-selection: he later moved toward a party whose tax rhetoric was closer to his already documented position.

4. He Says He Tried to Influence the Conservatives First

When Haidar announced his Reform support in April 2025, he said he had held meetings with the Conservative-run Treasury and proposed a flat £200,000 annual charge for non-doms covering overseas earnings.

According to his account, the proposal was not adopted.

This is an important piece of evidence because it demonstrates political advocacy on the exact tax issue that later became central to his support for Reform.

The claim is Haidar's account of those meetings; this chapter has not independently located Treasury minutes confirming the content or outcome.

5. January 2025: Candy Opens the Reform Door

Haidar attended the 28 January 2025 Reform fundraiser at Oswald's in Mayfair, organised by Nick Candy and Nigel Farage.

He paid £25,000 for a VIP/top-table place and told the Financial Times the event was a valuable opportunity to learn more about Reform's mission.

At that stage he described Reform as worth considering as a strong alternative to the Conservatives rather than presenting himself as a lifelong Farage supporter.

Contemporary Guardian reporting subsequently identified Haidar and Mohamed Amersi as Conservative donors who had come through Candy's contact book.

This is why Haidar remains the cleanest documented Candy conversion case.

6. April 2025: The Conversion Becomes Explicit

By 27 April 2025 Haidar had resigned from the Conservative Party and publicly pledged £1 million to Reform.

He said the Conservatives had "lost their way" and described himself as consistently pro-business.

He argued that Reform was the party capable of resetting the status quo and said Farage could become prime minister.

Most importantly for the influence analysis, Haidar explicitly connected his support to the expectation that Farage would reform taxation and encourage investment.

HAIDAR SAID THE QUIET PART OUT LOUD — BUT LEGALLY

Haidar's public case for Reform was not "I gave Nigel money, therefore he will change my tax bill." It was the legitimate democratic argument that he preferred a party whose prospective tax policy aligned with his interests and beliefs. That is donor self-selection unless evidence shows the donation bought privileged policy influence.

7. His Statement About a New Non-Dom Regime Is Crucial

In the April 2025 interview Haidar said he believed Farage would reform tax, encourage investment and "maybe come up with a new non-dom tax regime".

That statement matters because it predates Reform's June 2025 Britannia Card launch by roughly two months.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

But it establishes that one of Reform's newly recruited major donors was publicly hoping for precisely the broad policy direction Reform would soon announce: preferential tax treatment intended to attract or return internationally mobile wealthy people.

8. Then Reform Announced the Britannia Card

On 23 June 2025 Reform announced the Britannia Card: a proposed £250,000 contribution in exchange for ten-year renewable residence and preferential treatment of foreign income, gains and wealth.

Section 6.4 examined the policy principally through Christopher Harborne. Haidar is arguably the cleaner real-world policy-fit example because his tax preference was publicly documented before the policy launch.

He had already said that ordinary post-non-dom UK residence would cost him millions annually and that a £200,000 flat charge could have persuaded people like him to remain.

Reform's proposed £250,000 one-off card is not the same policy Haidar described. The similarity is therefore directional, not evidence of copied drafting.

A STRIKING SEQUENCE — NOT YET A CAUSAL CHAIN

May 2024: Haidar publicly opposes abolition of non-dom status and proposes a flat-tax alternative.

January 2025: Candy brings Haidar into a high-value Reform fundraiser.

April 2025: Haidar pledges £1m and publicly predicts Farage may create a new non-dom regime.

June 2025: Reform launches the Britannia Card.

That chronology is sufficiently close to justify a targeted consultation-record search. It is not sufficient to say Haidar bought or authored the policy.

9. The Numbers Require a Correction: Pledge and Cash Are Different

Haidar's £1 million announcement was a pledge, not a single £1 million accepted donation.

Electoral Commission-derived records show multiple Reform cash donations under variants of his name. The currently visible records include £25,000 in January 2025; £70,000, £65,000 and £65,000 in April; £30,000 in July; £100,000 in September; and further £100,000 and £50,000 donations in March 2026.

Aggregators can temporarily differ because donor-name variants and newly published quarterly records are merged at different speeds. For that reason, the report should retain transaction-level dates and EC references where possible rather than relying on a single aggregator total.

Contemporary reporting in January 2026 described Haidar as having donated £355,000 to Reform during 2025, consistent with the visible 2025 transactions when the January dinner payment is included.

Date / period	Known or reported support	Status
15 Jan 2025	£25,000 Reform donation / fundraiser-linked payment	Accepted donation in EC-derived data
8 Apr 2025	£70,000	Accepted donation
9 Apr 2025	£65,000	Accepted donation
22 Apr 2025	£65,000	Accepted donation
27 Apr 2025	£1m total commitment announced publicly	PLEDGE — not a single accepted £1m donation

Date / period	Known or reported support	Status
17 Jul 2025	£30,000	Accepted donation
25 Sep 2025	£100,000	Accepted donation
6 Nov 2025	£54,921 flights for Farage + two staff	Declared benefit to Farage, separate from party cash
23 Mar 2026	£100,000	Accepted Reform donation in current EC-derived records
30 Mar 2026	£50,000	Accepted Reform donation in current EC-derived records

10. His Relationship With Farage Later Became More Than Party Donations

By November 2025 Haidar was also directly financing activity for Farage rather than merely giving cash to Reform.

Farage's parliamentary interests record shows Haidar provided flights valued at £54,921.02 for Farage and two staff members for a US visit from 6 to 9 November 2025.

The declared purpose was a speaking engagement and charity event.

Reporting identified the destination/event context as a veterans' gathering at Donald Trump's Mar-a-Lago estate.

This is lawful declared support on the evidence reviewed. Its importance is that the relationship evolved from party donor to direct provider of high-value benefits enabling Farage's international political activity.

11. Access Has Therefore Become Demonstrable

Haidar's access is no longer inferred merely from the size of his donations.

He paid for a top-table fundraising seat with Farage, became a publicly celebrated defector, donated repeatedly, and later financed international travel for Farage and staff.

That does not tell us what was discussed privately.

It does mean the "access" rung of the influence ladder can be marked strong without speculation.

12. Haidar's Immigration Status Creates a Revealing Policy Contrast

Haidar was born in Nigeria to Lebanese parents, holds Lebanese citizenship and moved to Britain in 2010 according to contemporary reporting.

He is therefore himself an internationally mobile migrant whose ability to live in different jurisdictions is central to his tax planning.

Reform's political programme distinguishes sharply between forms of migration it considers economically desirable and those it seeks to restrict or reverse.

Haidar illustrates that distinction unusually clearly: the party's wealthy-migrant tax/residence offer is aimed at retaining or attracting people with precisely his international mobility and capital.

13. This Is Not Evidence of Hypocrisy by Itself

An immigration system can rationally treat an investor, worker, refugee and irregular entrant differently.

The relevant point is therefore not that Reform accepts money from an immigrant while criticising immigration.

The more substantive observation is distributive: Reform proposes especially favourable treatment for wealthy internationally mobile residents at the same time as proposing exceptionally coercive treatment for several other migrant categories.

Haidar is a concrete example of the class of mobile wealthy person the favourable side of that distinction is designed to retain.

14. His Business Interests Extend Beyond Tax

Haidar's portfolio creates other potential Reform-policy intersections, but the evidence is weaker than on non-dom taxation.

Fintech and venture-capital interests could benefit from lower capital taxation and permissive financial regulation; telecoms and infrastructure interests may benefit from investment-friendly regulation; medicinal cannabis creates a possible health/regulatory interest.

No evidence identified for this chapter shows Haidar lobbying Reform on any of those issues.

They should therefore remain monitoring categories rather than allegations of influence.

15. Medicinal Cannabis Is an Interesting Negative Control

Haidar's portfolio includes SafriCanna, a South African medicinal-cannabis business involved in research, clinical work and exports.

If Reform were simply tailoring policy to every donor's commercial interests, one might expect a conspicuous Haidar-linked cannabis liberalisation agenda.

No such donor-specific chain has been established in the evidence reviewed here.

That negative case is useful: a donor can possess many commercial interests while only some overlap with the political reasons he publicly gives for supporting a party.

16. The WEF Connection Is Real — and Mostly Irrelevant

Haidar has a public World Economic Forum profile and has participated in the organisation's business network.

This is factually worth recording because Reform supporters and politicians sometimes invoke the WEF as a symbol of an unaccountable global elite.

Membership or participation does not itself imply wrongdoing, conspiracy or policy control.

For this investigation its relevance is mainly sociological: Haidar is not an anti-establishment outsider in the ordinary economic sense. He is a globally networked business figure with access to international elite institutions.

AVOID THE WEF CONSPIRACY TRAP

"Haidar has a WEF profile" is a fact. "Therefore the WEF controls Reform" is not. The useful contradiction is narrower: Reform's anti-establishment brand is financed in part by people who are themselves deeply embedded in global business and elite policy networks.

17. His UK Property Exposure Makes Inheritance Tax Relevant Too

April 2025 reporting described Haidar as owning a substantial UK property portfolio and objecting not only to non-dom reform but also to inheritance-tax changes.

The post-April-2025 UK regime makes long-term residence increasingly relevant to the inheritance-tax treatment of overseas assets.

Reform's Britannia Card was advertised with unusually favourable inheritance-tax treatment as well as foreign-income/gains treatment.

Again, this produces strong policy alignment. Calculating Haidar's personal tax saving would require confidential facts about residence, ownership structures, asset values and final legislation, so no figure is attempted.

18. His Proposed £200,000 Flat Charge Makes the £250,000 Card Especially Worth Investigating

The numerical proximity is eye-catching: Haidar says he proposed a £200,000 annual flat tax for non-doms; Reform later proposed a £250,000 one-off Britannia Card contribution.

But the schemes are materially different in structure, duration and legal effect.

The similarity therefore cannot responsibly be presented as evidence that Reform copied Haidar's proposal.

It does, however, make one documentary question unusually high priority: who was consulted on the Britannia Card between Candy's January fundraiser and the June launch?

19. The Missing Evidence Is Consultation

We know Haidar held a specific tax preference.

We know Candy brought him into Reform's donor environment.

We know he publicly committed substantial funding.

We know he expected Farage to pursue a replacement non-dom-style regime.

We know Reform shortly afterwards launched a policy broadly serving that objective.

What we do NOT know is whether Haidar discussed the Britannia Card with Farage, Candy, Yusuf, James Orr, tax advisers or policy staff before its announcement.

THIS IS THE DOCUMENT THAT WOULD MATTER

An email, meeting note or policy-drafting record showing Haidar proposing or commenting on the Britannia Card before 23 June 2025 would materially upgrade the influence assessment. Without it, chronology plus alignment remains circumstantial.

20. Applying the Seven-Link Influence Ladder

Link	Haidar evidence	Assessment
1 — MONEY	Repeated Reform donations; £1m pledge; £54,921 direct travel benefit to Farage/staff	STRONG
2 — INTEREST	International income, investment, UK property, non-dom/IHT exposure	VERY STRONG
3 — ACCESS	Candy fundraiser/top table; public defection; repeated support; direct Farage travel sponsorship	STRONG
4 — PREFERENCE	Publicly opposed non-dom abolition; proposed £200k flat charge; expected Farage to create new regime	VERY STRONG / DOCUMENTED
5 — ALIGNMENT	Britannia Card broadly serves the policy objective Haidar publicly advocated	VERY STRONG
6 — OPPORTUNITY	Major donor with repeated direct access during policy-development period	STRONG
7 — CAUSATION / BENEFIT	No evidence yet he drafted, negotiated, requested or obtained the Britannia Card	NOT ESTABLISHED

21. Haidar Is Stronger Than Harborne on One Evidential Link

Harborne remains far more important financially and has a much deeper personal relationship with Farage.

But Haidar provides something the Harborne tax analysis lacked: a public pre-policy statement of the donor's desired tax outcome.

That makes the preference → policy-alignment link unusually strong.

Conversely, the Harborne crypto case has stronger evidence of actual Farage regulatory intervention. The two cases therefore illuminate different parts of the influence chain rather than competing for a single "most suspicious donor" label.

22. The Candy Link Also Becomes More Substantive

Candy's significance is not simply that Haidar attended one of his dinners.

Candy was explicitly targeting wealthy non-doms and internationally mobile high-net-worth individuals as Reform donors.

Haidar was exactly such a person and had already announced that UK tax reform was driving him abroad.

Candy successfully brought that donor into Reform's fundraising orbit; Reform subsequently launched a flagship policy aimed at attracting internationally mobile wealthy people.

Again, this is a strong governance reason to disclose who participated in policy consultation — not evidence that Candy sold policy access.

23. A Potentially Important Temporal Distinction

Haidar's first £25,000 Reform payment appears in January 2025, before his public £1 million commitment.

His larger April donations were accepted before the public announcement of the £1 million pledge on 27 April.

The Britannia Card was not publicly launched until late June.

Any private consultation occurring between January and June would therefore sit inside a period when Haidar had already become a donor and before the policy became public.

That is the precise evidential window future document searches should target.

24. What We Can Say Safely

- Haidar was a major Conservative donor before Candy brought him into Reform's fundraising environment.
- He had publicly and specifically opposed the abolition of non-dom treatment before becoming a major Reform supporter.
- He said he had proposed an alternative flat-tax regime to the Conservative government.
- He publicly expected Farage to reform tax and potentially create a new non-dom regime.
- He pledged £1 million to Reform and made multiple accepted donations, although the pledge and accepted cash must not be conflated.
- He later provided a £54,921 declared travel benefit to Farage and two staff.

- Reform's Britannia Card strongly aligns with Haidar's publicly stated desire for preferential treatment of internationally mobile wealth.
- No public evidence identified here proves that Haidar caused or drafted the Britannia Card.

25. What We Cannot Say

- That Haidar bought the Britannia Card.
- That his £1 million pledge was paid as a single £1 million donation.
- That Farage promised Haidar a tax concession in return for funding.
- That Candy offered policy access as part of donor recruitment.
- That the £250,000 Britannia Card price was derived from Haidar's £200,000 flat-tax suggestion.
- That Haidar personally would qualify for or use the Britannia Card.
- That his sponsorship of Farage's US travel was improper; it was declared in the parliamentary register.
- That Haidar's WEF participation implies any hidden institutional control.

26. The Evidence That Would Upgrade the Case

- Candy or Farage correspondence with Haidar about non-dom replacement policy before 23 June 2025.
- Reform policy-team meeting records naming Haidar as a Britannia Card consultee.
- Drafts or briefing papers containing Haidar's £200,000 flat-tax concept or comments.
- Evidence that Haidar conditioned donations on a particular tax policy.
- Private donor-event records showing substantive tax-policy discussion rather than general political conversation.
- Any subsequent Haidar application for or public endorsement of the Britannia Card on personal-benefit grounds.
- Records showing Reform policy officials sought Haidar's advice because of his non-dom working group.

27. The Evidence That Would Weaken the Case

- Policy drafts showing the Britannia Card was substantially complete before Haidar entered Reform's donor orbit.
- Documented authorship by independent advisers with no Haidar contact.
- Evidence that the £250,000 design was derived from another country's regime or independent modelling.
- Haidar stating credibly that he had no prior knowledge of the card and was not consulted.
- Internal records showing no policy contact between Haidar and Reform beyond general fundraising.

SECTION 6.10 VERDICT

Bassim Haidar is the strongest Candy conversion case and one of the clearest donor-policy alignment cases in the report because his desired policy direction is documented in his own words before Reform launched the Britannia Card.

The chain currently reaches:

MONEY + COMMERCIAL/PERSONAL INTEREST + ACCESS + DOCUMENTED POLICY PREFERENCE + STRONG SUBSEQUENT POLICY ALIGNMENT.

It still stops before the decisive final link:

NO EVIDENCE YET OF HAIDAR CONSULTATION, POLICY AUTHORSHIP, QUID PRO QUO OR CAUSATION.

The appropriate verdict is therefore:

HIGH-PRIORITY INFLUENCE LEAD — STRONG CIRCUMSTANTIAL ALIGNMENT, CAUSATION UNPROVED.

28. Why Haidar Changes the Britannia Card Investigation

Section 6.4 treated the Britannia Card primarily as a potential Harborne benefit.

Haidar changes the emphasis. He gives us a donor who publicly described the exact policy problem, proposed an alternative tax treatment, left Britain because of the reform, entered Reform through Candy's donor network, committed major funding and predicted Farage would create a new non-dom regime before Reform unveiled the card.

That makes the policy-development history itself a priority research target.

The remaining evidential question is therefore less about hypothetical tax arithmetic than about authorship, consultation and chronology.

Money And Influence: Mapping Reform UK’s Donor Network

Evidence-based public interest review • 13 August 2026

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

THE CENTRAL FINDING

The Cottrell case is fundamentally different from an ordinary donor-policy investigation. The immediate question is not what Fiona Cottrell wanted from Reform, but whether money registered or presented as coming from Fiona was economically hers in the first place.

Public reporting in July 2026 disclosed that George Cottrell transferred more than $2 million to his mother in 2024 shortly before major payments associated with Reform UK. Separately, Fiona made two £250,000 donations to Reform in May 2024 and transferred approximately £1.075 million to Richard Tice's Britain Means Business in June. £500,000 then moved from Britain Means Business to Reform. The Metropolitan Police are investigating the May donations for potential offences concerning concealment of the true donor; George and Fiona have reportedly been interviewed under caution. No arrests have been made and no criminal wrongdoing has been established.

The correct evidential position is therefore: SOURCE-OF-FUNDS QUESTION SUPPORTED BY SERIOUS DOCUMENTARY REPORTING + ACTIVE POLICE INVESTIGATION — LEGAL CONCLUSION NOT YET DETERMINED.

1. Why the Registered Donor Is Not Necessarily the End of the Inquiry

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

UK electoral law specifically prohibits arrangements designed to conceal or disguise the identity of the true donor. That is why source-of-funds evidence matters where money may have been provided to one person for onward political donation.

The Cottrell investigation must therefore distinguish four concepts throughout: REGISTERED DONOR; BANK-ACCOUNT SENDER; REPORTED ECONOMIC SOURCE; and LEGALLY DETERMINED DONOR.

Those categories may ultimately prove identical. At present, they cannot responsibly be assumed to be.

2. Fiona Cottrell's Apparent Means Became a Public Question

Fiona Cottrell, formerly Fiona Watson, is the daughter of the 3rd Baron Manton and mother of George Cottrell.

She emerged publicly as one of Reform's largest individual supporters despite little public evidence of a comparable self-made commercial fortune.

Guardian reporting in July 2026 described her as being of relatively modest means while noting that payments associated with Reform and Britain Means Business totalled approximately £1.75 million.

3. May 2024: Two £250,000 Donations to Reform

In May 2024 Fiona Cottrell made two £250,000 donations to Reform UK — £500,000 in total.

Those payments were accepted and reported as donations from Fiona.

The Metropolitan Police later opened an investigation after a February 2025 referral from the Electoral Commission.

The stated legal focus reported publicly is potential evasion of political-donation restrictions, including section 61 of the Political Parties, Elections and Referendums Act 2000, which addresses concealment or disguise of the person making a donation.

An investigation is not a finding of guilt. The £500,000 should therefore remain described as Fiona's registered donations while the source-of-funds issue is separately identified as unresolved.

4. The Newly Reported George-to-Fiona Transfers Change the Evidential Picture

On 29 July 2026 the Guardian reported that George Cottrell transferred more than $2 million to Fiona during 2024 shortly before her large Reform-related payments.

The reporting says the transfers moved through cryptocurrency exchanges and money-service businesses and were identified during banking scrutiny.

According to the report, when Fiona's bank questioned the source of funds, she identified George as the source.

If accurate, that evidence is highly relevant because it supplies a plausible economic source external to Fiona for at least some of the money moving through her accounts.

THE KEY DISTINCTION

"George transferred money to Fiona" does NOT automatically equal "George secretly donated to Reform through Fiona."

To establish the latter, investigators would need to connect the particular funds, timing, purpose, control and intention to the regulated political donations. The reported transfers make that inquiry necessary; they do not answer it by themselves.

5. June 2024: Britain Means Business Becomes the Second Route

The following month Fiona transferred approximately £1.075 million to Britain Means Business Ltd, a company controlled by Richard Tice and previously known as Leave Means Leave.

Guardian reporting initially described approximately £1 million arriving on 10 June 2024; later Financial Times reporting put the payment at £1.075 million.

Britain Means Business was functioning as a fundraising vehicle connected to Reform during the general-election campaign.

Within days, £500,000 was transferred from Britain Means Business into Reform UK.

This route matters because the money reaching the party was formally coming from a company rather than directly from Fiona, even though reporting identifies Fiona's account as the immediate source of the large payment into that company.

6. The Same-Day Tice Transaction Makes the Flow More Complicated

Financial Times reporting published in August 2026 adds a further transaction to the chronology.

On the same day Fiona's £1.075 million reached Britain Means Business, £200,000 was repaid on a loan involving Tice's separate company, Tisun Investments Ltd.

The FT also reports that £500,000 was donated onward to Reform that day.

But the coincidence in timing makes Britain Means Business a central node rather than a mere pass-through footnote.

Date / period	Transaction / event	Recorded or reported parties	Evidential status
May 2024	£250,000 Reform donation	Fiona Cottrell → Reform UK	Registered donation; under Met investigation
May 2024	Second £250,000 Reform donation	Fiona Cottrell → Reform UK	Registered donation; under Met investigation
2024, before/around major payments	More than $2m transfers reported	George Cottrell → Fiona Cottrell	Reported from banking/financial evidence; relevance under investigation
10 June 2024	Approx. £1.075m transfer	Fiona Cottrell → Britain Means Business	Reported by Guardian/FT
10 June 2024	£500,000 political funding	Britain Means Business → Reform UK	Reported transaction / political funding route
10 June 2024	£200,000 loan repayment	Britain Means Business/Tice-related flow involving Tisun Investments	FT-reported same-day transaction; purpose/source requires documents

Date / period	Transaction / event	Recorded or reported parties	Evidential status
Feb 2025	Electoral Commission referral	Electoral Commission → Metropolitan Police	Reported origin of criminal investigation
July 2026	Interviews under caution	George and Fiona Cottrell	Reported; no arrests
July 2026 onward	Broader financial scrutiny	Banks / NCA / Met	Active or reported scrutiny; not criminal findings

7. Reform Was in a Cash Crunch

The timing of the June transfer is politically important.

Guardian reporting says Reform was facing a short-term cash crunch in the final weeks of the 2024 general-election campaign and needed money for priority constituencies, including Clacton and Boston and Skegness.

The £500,000 reaching Reform from Britain Means Business therefore arrived at a moment of unusually high operational value.

8. Reform's Bank Account Was Also Frozen During the Campaign

Financial Times reporting in July 2026 disclosed that Reform's Arbuthnot Latham bank account was frozen for approximately two weeks during the 2024 election while compliance checks were carried out.

The freeze created operational difficulties and reportedly even delayed the return of an impermissible donation.

The bank has not publicly disclosed the confidential reason for the freeze.

It would therefore be unsafe to claim that the freeze was caused by the Cottrell/Britain Means Business transactions unless documentary evidence establishes that connection.

DO NOT CONNECT UNPROVED DOTS
Campaign cash pressure + a frozen bank account + unusual donor flows is a striking combination. It is not evidence that one caused the other. Each fact remains evidentially independent unless bank records, investigators or documentary evidence explicitly connect them.

9. Bankers Filed Suspicious Activity Reports

Banking staff reportedly considered several Reform-related transactions sufficiently unusual to file suspicious activity reports with the National Crime Agency.

The Britain Means Business transfer was among the transactions reported.

A suspicious activity report is an intelligence mechanism, not an accusation, charge or finding of money laundering.

The correct formulation is therefore that banking compliance professionals identified activity warranting further scrutiny — not that the money was laundered.

10. The NCA's Difficulty Tracing the £1m Is Important — but Needs Updating Carefully

Early July reporting said bankers and the NCA had been unable to trace the original source of the approximately £1 million Fiona transferred to Britain Means Business.

Later July reporting disclosed more than $2 million in George-to-Fiona transfers and said Fiona identified George to bankers as the source of funds.

Those reports should not be flattened into a single conclusion. The later evidence may illuminate the earlier source-of-funds question, but only investigators can establish whether particular incoming George transfers funded the particular £1.075 million payment.

The chapter therefore treats the economic-source link as strongly indicated by reporting but not forensically proven in public.

11. George Cottrell's Own Political Role Makes the Question More Consequential

George Cottrell is not an unrelated family member who happened to transfer money to his mother.

He has been a longstanding associate of Nigel Farage, worked around UKIP's Brexit campaign, accompanied Farage publicly and remained close to his political operation.

Reform says George has never held an official party role, while reporting has described him as exercising substantial informal influence and sometimes presenting himself in chief-of-staff or "shadow treasurer" terms.

That contested informal status matters because an economic source closely embedded around party leadership creates a different governance question from money originating with a politically disengaged relative.

12. George's Criminal History Raises Due-Diligence Questions, Not Automatic Guilt

George Cottrell pleaded guilty in the United States in 2016 to wire fraud connected with a money-laundering sting and served a prison sentence.

That conviction is relevant to donor and source-of-funds due diligence because political parties should understand the financial and reputational risks associated with people moving substantial money around their leadership.

It does not prove that any later transaction was criminal.

The report should resist the rhetorical shortcut "convicted fraudster therefore current money is fraudulent". Past conduct justifies enhanced scrutiny; it does not substitute for evidence.

13. George's Declared Personal Donations Were Much Smaller

Public reporting has contrasted the scale of money moving through Fiona with George's much smaller officially declared political donations.

The Guardian reported George as having officially donated about £15,000 while describing much larger reported financial support around Reform and Farage.

That disparity is one reason the source-of-funds question is significant.

It is not itself proof that larger payments should legally have been registered in George's name.

14. George Also Had Financial Dealings With Richard Tice

Reporting has identified an £80,000 loan from George Cottrell to Richard Tice.

That creates another direct financial connection between George and Reform's senior leadership independent of Fiona's registered donations.

The existence of a private loan is not inherently improper.

For network analysis, however, it reinforces that George was financially connected to multiple senior figures while publicly lacking a formal Reform office.

15. Britain Means Business Needs to Be Treated as Its Own Financial Node

Britain Means Business should not be described merely as "Reform's bank account". It is a separate company controlled by Tice that had historical roots in Leave Means Leave and was used as a fundraising vehicle.

Its legal identity matters because political-finance permissibility and reporting can depend on which entity receives money and which entity later makes the regulated donation.

The central accounting questions are therefore: what did Britain Means Business receive; on what terms; what did it transfer to Reform; what did it pay elsewhere; and how were those transactions classified in its accounts and Reform's returns?

The company's bank statements, ledgers, loan agreements and board records would be far more probative than political statements about what the money "really was".

16. The £500,000 Britain Means Business Donation Is Separate From Fiona's May £500,000

The numbers are easy to confuse and should be kept rigidly separated.

Fiona's May political donations were two direct £250,000 payments registered in her name: £500,000 total.

The June route involved approximately £1.075 million from Fiona to Britain Means Business, followed by £500,000 from that company to Reform.

The Met investigation was initially reported in relation to the May donations, while later reporting said the inquiry was broader and had origins connected with the June Britain Means Business payment.

The document should therefore avoid collapsing the two £500,000 figures into one transaction.

TWO DIFFERENT £500,000 FLOWS

MAY 2024: Fiona → Reform = £250k + £250k = £500k.

JUNE 2024: Fiona → Britain Means Business ≈ £1.075m; Britain Means Business → Reform = £500k.

They are separate routes and potentially raise different legal/accounting questions.

17. The Police Investigation Is Now Broader Than First Reported

The Metropolitan Police confirmed an investigation launched in February 2025 after an Electoral Commission referral.

Initial reporting focused on the two May donations and possible concealment of an impermissible donor.

Subsequent reporting said the inquiry was broader and examined other financial issues relating to Reform.

George and Fiona were reported to have been interviewed under criminal caution in July 2026. Being interviewed under caution means investigators suspect an offence may have occurred and wish to preserve evidential rights; it is not a charge or finding.

No arrests had been reported in the sources reviewed for this chapter.

18. Reform and the Cottrells Deny Wrongdoing

Reform says it follows Electoral Commission rules and carries out stringent vetting of donations.

Richard Tice has said Fiona was a permissible donor and characterised reporting around the transactions as politically motivated smears.

Lawyers acting for George Cottrell have said suggestions that he donated impermissibly to Reform are unfounded.

Those denials belong in the evidential record alongside the investigative reporting and police inquiry.

19. Tice's "I've Known the Family for 50 Years" Is Not Due Diligence

When questioned about the £1 million payment, Tice said he had known the Cottrell family for 50 years.

Personal familiarity may explain why a recipient felt comfortable with a donor, but it is not a substitute for source-of-funds checks where unusually large political payments are involved.

This distinction is particularly important when the donor's apparent means, the size of the transfer and related financial relationships generate compliance questions.

A prospective governing party should be able to demonstrate institutional due diligence independent of personal trust.

20. What Section 61 Actually Makes Relevant

Section 61 of the Political Parties, Elections and Referendums Act 2000 addresses attempts to evade donation restrictions, including knowingly giving false information or facilitating arrangements that conceal or disguise the identity of the donor.

That makes intention and arrangement central. It is not enough merely to show that person A previously transferred money to person B.

Investigators would need evidence capable of showing that a regulated donation attributed to Fiona was in reality made under an arrangement designed to conceal another donor or otherwise evade the statutory restrictions.

The police investigation means authorities consider the issue sufficiently serious to examine. It does not mean that statutory test has been met.

21. Permissibility of George Is a Separate Question

Even if George were shown to be the economic source of funds, a second legal question would arise: was he himself a permissible donor at the relevant time?

Permissibility for an individual ordinarily depends on qualifying UK electoral registration, while companies and other entities have different tests.

Public statements by Tice have asserted that George was permissible.

This report should not determine his status from nationality, residence or press description alone; the relevant electoral-register evidence at the transaction dates would be required.

22. The Same-Day Loan Repayment Raises a Different Governance Question

The £200,000 same-day repayment involving Tice's business interests is not primarily a political-donor permissibility question.

It raises questions about related-party flows, the purpose of Britain Means Business, and whether money entering a political fundraising vehicle was simultaneously servicing obligations connected with its owner's other business interests.

There may be a perfectly documented commercial explanation.

The governance test is whether the company can demonstrate the source, contractual basis and accounting treatment of each flow without relying on retrospective verbal explanations.

23. Reform's Repayment of Tice's Party Loans Adds Another Layer

The Financial Times reports that Reform had cleared its debt to Tice by April 2025, primarily through reclassification of earlier loans as donations rather than conventional cash repayment.

That is a separate accounting mechanism from the £200,000 Tisun-related repayment and should not be conflated with it.

Former Reform treasurer Mehrtash A'zami reportedly raised concerns about communication around some loan reclassifications.

The broader point is that Tice occupied several simultaneous positions — party leader/deputy, lender, company owner and controller of a fundraising vehicle — making clean documentation especially important.

24. A Transaction Map Is More Useful Than a Conspiracy Narrative

Node	Documented/reported role	Question requiring evidence
George Cottrell	Reported source of >$2m transfers to Fiona; Farage associate; £80k Tice loan; smaller official donations	Which funds came from George, and with what purpose/instructions?
Fiona Cottrell	Registered donor of £500k; sender of ~£1.075m to BMB	Were the funds beneficially/economically hers at the relevant times?
Britain Means Business	Tice-controlled fundraising company; received Fiona payment; gave £500k to Reform	How were receipts, onward donation and other same-day flows accounted for?
Reform UK	Recipient of May £500k direct + June £500k from BMB	What source-of-funds and permissibility checks were performed?
Richard Tice	Controlled BMB; senior Reform figure; separate business/loan relationships	What knowledge/approval did he have of the source and routing?
Tisun Investments	Tice company involved in reported £200k loan repayment	What obligation was repaid and from which funds?
Electoral Commission	Regulator; referred matter to Met	What evidence prompted referral?
Metropolitan Police	Criminal investigation	Whether statutory offences can be proved

Node	Documented/reported role	Question requiring evidence
Banks / NCA	AML intelligence and scrutiny	Whether transaction sources/routes can be established

25. The Economic-Source Hypothesis

The strongest hypothesis raised by the public evidence is that George supplied substantial money to Fiona and that Fiona subsequently made very large Reform-related payments.

That hypothesis is supported by reported banking records and timing.

The stronger proposition — that George intentionally used Fiona as a conduit to conceal political donations — remains unproved and is the subject of investigation.

The report must preserve that line exactly. It is both more accurate and more legally robust than either dismissing the connection or declaring the case solved.

26. Applying the Evidence Ladder

Link	Evidence	Assessment
George → Fiona money	> $2m transfers reported from banking evidence; Fiona reportedly identified George as source	STRONG REPORTED EVIDENCE
Fiona → Reform	Two £250k registered May donations	ESTABLISHED
Fiona → BMB	~£1.075m June transfer reported by multiple investigations	STRONG
BMB → Reform	£500k onward political funding	STRONG / REPORTED & REGULATORY-RELEVANT
George funds → specific Fiona Reform donations	Timing/source evidence suggests possible link	NOT PUBLICLY FORENSICALLY TRACED
Concealment arrangement / intention	Met investigating potential offence	NOT ESTABLISHED

Link	Evidence	Assessment
Impermissible underlying donor	Depends on identity/status and arrangement	NOT ESTABLISHED
Criminal liability	No charge/conviction reported	NOT ESTABLISHED

THE LEGALLY SAFE BOTTOM LINE

There is now credible public evidence that George Cottrell transferred very large sums to Fiona shortly before she made very large Reform-related payments. That is sufficient to make the economic source of the political money a serious question and explains the active police investigation.

It is NOT sufficient to state as fact that George secretly donated £500,000 or £1.5 million to Reform through his mother. That conclusion requires tracing and proof of the statutory arrangement and intent.

27. The £1.75 Million Figure Needs Careful Language

Reporting has described Fiona as providing approximately £1.75 million to Reform and its fundraising vehicle.

That combines £500,000 in direct May donations with the larger June payment to Britain Means Business; it should not be described as £1.75 million donated directly to Reform.

Likewise, the full £1.075 million transferred to Britain Means Business did not all become a Reform donation on the public evidence reviewed.

Precise route language prevents a large headline number from obscuring what actually happened.

28. Why This Matters to the Wider Report

Most of Part VI asks whether concentrated wealth creates access and policy influence.

The Cottrell case asks a more basic democratic-finance question: can the public reliably identify the economic people behind political funding?

If the registered donor is only an intermediary, donor registers cease to perform their transparency function. Conversely, if Fiona can demonstrate that the money was genuinely hers to dispose of and the donations were lawful, that conclusion matters equally.

This is why source-of-funds investigations should be resolved through records rather than insinuation.

29. The George–Farage Relationship Increases the Governance Stakes

George's longstanding proximity to Farage means any finding that he economically financed Reform through another person would have implications beyond a technical donor-register error.

It would raise questions about informal power, undisclosed financial dependence and the accuracy of Reform's repeated claim that George had no official role.

But those consequences depend on the underlying finding being established.

Until then, the relationship is context — highly relevant context — rather than proof.

30. The New NCA Lawsuit Does Not Resolve the Transactions

In August 2026 Farage and Tice launched legal proceedings against the National Crime Agency over alleged leaks of confidential banking information.

Their complaint concerns the handling/disclosure of private financial intelligence, not a judicial determination that the underlying transactions were lawful or unlawful.

Likewise, an improper leak — if eventually established — would not automatically invalidate the factual content of banking records; nor would accurate reporting excuse an unlawful disclosure.

The source-of-information dispute and the source-of-funds investigation should therefore be analysed separately.

31. What We Can Say Safely

- Fiona Cottrell was the registered donor of two £250,000 Reform donations in May 2024.
- She subsequently transferred approximately £1.075 million to Richard Tice's Britain Means Business, from which £500,000 reached Reform.
- George Cottrell reportedly transferred more than $2 million to Fiona in 2024 before major Reform-related payments, and Fiona reportedly identified George as the source of funds when questioned by bankers.
- The Electoral Commission referred matters to the Metropolitan Police, which opened an investigation in February 2025.
- George and Fiona were reportedly interviewed under caution in July 2026; no arrests or criminal findings have been reported.
- Banks filed suspicious activity reports concerning relevant transactions; SARs are intelligence reports, not findings of criminality.
- The public evidence justifies a serious source-of-funds inquiry but does not establish that George was legally the true donor of Fiona's political donations.

32. What We Cannot Say

- That Fiona was merely a front or straw donor.
- That George secretly donated the £500,000 registered in Fiona's name.
- That the entire £1.075 million Britain Means Business payment came from George.
- That any Cottrell money was laundered.
- That Richard Tice knowingly accepted impermissible political money.
- That the £200,000 same-day loan repayment used Fiona's specific funds.
- That Reform's 2024 bank freeze was caused by these transactions.
- That an NCA suspicious activity report is evidence of guilt.

- That interviews under caution mean George or Fiona will be charged.

33. The Documents That Could Resolve the Case

- Fiona Cottrell's bank statements showing incoming George transfers and outgoing May/June payments with dates, currencies and balances.
- George Cottrell's originating bank/crypto-exchange records identifying beneficial ownership and transfer instructions.
- Any correspondence between George and Fiona concerning Reform, Britain Means Business or the purpose of the transfers.
- Britain Means Business bank statements and general ledger for June 2024.
- The agreement and ledger supporting the £200,000 Tisun-related loan repayment.
- Reform's donor due-diligence file for Fiona and Britain Means Business.
- Any source-of-funds declarations or explanations supplied to Reform or its bank.
- The Electoral Commission referral material, if eventually disclosable.
- Corporate accounts and loan schedules reconciling BMB, Tice, Tisun and Reform flows.
- The outcome of the Metropolitan Police investigation and any charging decision.

34. A Forensic Reconstruction Standard for the Next Pass

Every future Cottrell claim should be placed on a dated ledger.

For each transfer record: sender account; recipient account; legal owner; beneficial/economic source if known; amount; currency; conversion; stated purpose; onward destination; political-reporting treatment; and source reliability.

Where a source reports "about £1m", retain the approximate figure unless a later authoritative record supplies the exact amount.

Where different outlets report different dates or amounts, preserve both until primary documentation resolves the discrepancy.

This is the section of the report where accounting precision matters more than rhetorical force.

SECTION 6.11 VERDICT

The Cottrell money trail has moved beyond mere suspicion. There is credible reporting of large George-to-Fiona transfers preceding Fiona's Reform-related payments; there are unusual onward corporate flows; banking compliance teams filed reports; the Electoral Commission referred the matter; and the Metropolitan Police are actively investigating.

But the most serious allegation — that George intentionally used Fiona to conceal political donations — remains an allegation under investigation, not an established fact.

The appropriate classification is:

STRONG SOURCE-OF-FUNDS RED FLAGS + ACTIVE CRIMINAL INVESTIGATION + MATERIAL INFORMAL-POLITICAL CONNECTION — TRUE DONOR / ILLEGAL CONCEALMENT NOT YET DETERMINED.

Money And Influence: Mapping Reform UK’s Donor Network

Evidence-based public interest review • 13 August 2026

6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

THE CENTRAL FINDING

On paper, Reform UK had a clear financial-control structure in 2024. Mehrtash A'zami was the registered treasurer, and Reform's own Electoral Commission-approved financial scheme made him responsible for the whole party's compliance with political-finance law: accounting records, donor permissibility, loan records, weekly election-period reporting, campaign expenditure and the systems required to make those duties work.

The emerging 2024–25 record exposes a different problem: FORMAL RESPONSIBILITY MAY NOT HAVE BEEN MATCHED BY EFFECTIVE INFORMATION AND CONTROL. A'zami says he was not told about the later reclassification of £613,000 of Tisun loans into donations and was unaware of further 2025 repayments. Reform, responding to recent reporting, says he had "ultimate responsibility" and "complete oversight". Those propositions cannot simply be treated as equivalent. If the registered treasurer lacked visibility of material transactions, the governance system failed even if the legal responsibility remained his.

The appropriate conclusion is therefore not that Reform lacked a treasurer. It is that the available evidence raises serious questions about whether the party's formal financial scheme operated in practice during the period of Farage's return and rapid movement of large sums.

1. The Legal Responsibility Was Not Ambiguous

The Electoral Commission's current guidance is explicit: every registered political party must appoint a registered treasurer, and that treasurer is responsible for ensuring that the party follows the rules on donations and loans.

The central-party treasurer must maintain accounting records capable of explaining transactions, take all reasonable steps to ensure donations and loans can lawfully be accepted, and report the relevant transactions to the Commission.

During a UK parliamentary general election, the treasurer remains responsible for pre-poll donation and loan reporting and must declare that those reports are complete and correct.

This is therefore not merely an honorary finance title. The registered treasurer is the legally accountable compliance officer at the centre of the party's financial architecture.

2. Reform's Own Financial Scheme Went Further

The financial scheme Reform supplied to the Electoral Commission named Mehrtash A'zami as registered treasurer and assigned him responsibility for the whole party's compliance with PPERA.

It required him to keep records of donations, check permissibility, return impermissible or unidentified donations, report donations and regulated transactions, keep loan terms and participants recorded, and submit election-period weekly reports.

The scheme also said Reform had no separate accounting units: local or affiliated financial affairs were to be controlled centrally by the party treasurer.

Finally, the scheme required A'zami to ensure the leader and other officers had sufficient knowledge of the party's legal financial obligations.

In formal governance terms, therefore, Reform had deliberately adopted a highly centralised financial-control model.

Formal Reform control in financial scheme	A'zami's stated responsibility
Donation records	Record donor, amount, address, company number where applicable, received/accepted/returned dates
Permissibility	Check donations over the legal threshold within 30 days; return/surrender impermissible or unidentified money
Loans / regulated transactions	Record participants, value, nature, date and terms; ensure authorised participants
Quarterly reporting	Submit donations and regulated-transaction returns
General-election period	Provide weekly donation/loan reports
Campaign expenditure	Authorise, monitor and submit statutory campaign expenditure returns
Accounting records	Maintain processes capable of explaining party transactions
Party-wide compliance	Central control of financial affairs and compliance education for other officers

FORMAL DESIGN: STRONG CENTRAL CONTROL

Reform cannot plausibly say that nobody was designated to supervise its finances. Its own scheme placed responsibility unusually clearly in one registered treasurer. The governance question is whether the organisation actually supplied that treasurer with complete, timely information and effective authority.

3. A'zami Was Not a Temporary Election Appointment

A'zami had been embedded in the organisation since its Brexit Party period.

Electoral Commission documents identify him as registered treasurer for years before the 2024 election, while Companies House records show him serving as company secretary from June 2019 until 19 February 2025.

He also held a small shareholding in the old corporate structure before Reform's later reorganisation.

That longevity matters because any suggestion that he was an inexperienced outsider parachuted into an unusually complex election does not fit the corporate and regulatory record.

4. The Organisational Weakness Is Potentially the Opposite: Too Much Reliance on One Person

A centralised scheme can simplify accountability, but it can also create key-person risk.

If one treasurer is simultaneously expected to maintain records, check donors, monitor loans, supervise campaign spending, educate officers and report everything to the regulator, the system depends on every senior figure and related entity supplying him with complete information.

That vulnerability becomes acute when party leaders, lenders, donor-connected companies and informal advisers are independently moving money around the political operation.

The registered treasurer cannot report a transaction accurately if the people controlling it do not tell him what has happened.

5. Richard Tice Was Simultaneously Leader, Lender and Company Controller

Richard Tice occupied several financially important positions before and during Farage's return.

He was party leader until June 2024, one of the party's principal financiers, owner of Tisun Investments — which had lent Reform more than £1 million — and controller of Britain Means Business, the separate company that became a major donor/fundraising route.

None of those overlapping roles is inherently unlawful.

They create obvious related-party governance risk because transactions can involve the same individual on several sides: senior party officer, creditor, owner of a donor company and beneficiary or decision-maker in associated commercial arrangements.

6. The Tisun Loans Were Material to Reform's Survival

Reform's historic accounts show that the party relied heavily on director-related loans from Tice.

By the end of 2022 the party reported net liabilities exceeding £1.1 million, with approximately £1.083 million outstanding to a Tice-linked lender and repayable when the party's cash position allowed.

This meant Tice's private financial support was not peripheral. It was part of the party's balance-sheet survival.

Any agreement about Farage's return that also addressed repayment or conversion of those loans therefore had direct implications for the party's financial governance.

7. March–June 2024: Political Leadership and Financial Liabilities Converge

Recent reporting says Farage's prospective return to Reform leadership was discussed months before the general-election announcement and that the arrangements included dealing with money owed to Tice.

The Sunday Times reported a behind-the-scenes plan under which Tice would step down for Farage and Reform would repay or otherwise resolve more than £1 million of Tice-linked loans.

Reform disputes characterisations of a secret deal and says Farage's decision to return changed only in early June.

Whichever political account is ultimately correct, the financial fact remains: leadership transition and Tice's substantial creditor position were contemporaneous and therefore required clean, documented governance.

8. The First £200,000 Repayment Apparently Went to the Wrong Account

A'zami told the Financial Times that he was given a repayment schedule for approximately £1.08 million owed to Tice's company.

According to his account, a clerical error caused the first £200,000 instalment to be sent to the wrong account, after which he was instructed not to make further payments.

The Electoral Commission has reportedly acknowledged that at least some repayment information was recorded incorrectly and that its public database required amendment.

An isolated clerical mistake can happen in any organisation. In a high-risk political-finance environment, however, it is evidence that payment authorisation, recipient verification and reconciliation controls matter.

A BASIC CONTROL QUESTION

For a six-figure related-party repayment, who prepared the payment, who verified the beneficiary account, who authorised release, and who reconciled the transaction afterward? A robust finance function should be able to answer all four questions from records.

9. June 10, 2024 Is the Governance Stress Test

Section 6.11 reconstructed the June 10 cluster: Fiona Cottrell transferred approximately £1.075 million to Tice-controlled Britain Means Business; Britain Means Business transferred £500,000 to Reform; and a £200,000 Tice-related loan repayment was made on the same day.

Those are not proven to be a single economic transaction and should not be described as such.

But from a governance perspective, the simultaneous movements create exactly the environment in which segregation of duties, related-party declarations, source-of-funds review and independent reconciliation are required.

The relevant question is whether A'zami and the party finance function had contemporaneous sight of the complete transaction picture or only the portion passing through Reform's account.

10. Britain Means Business Sat Outside the Party but Inside the Political Finance Network

Britain Means Business was legally separate from Reform and controlled by Tice.

That separation creates a genuine compliance boundary: Reform's treasurer could perform permissibility checks on a donation received from the company, but the economic source of money entering that company may require further inquiry where circumstances generate source-of-funds risk.

Electoral Commission guidance now emphasises taking all reasonable steps to know the true identity of a donor rather than treating the name on a bank transfer as the end of every inquiry.

The Cottrell reporting illustrates why: corporate intermediaries can be permissible donors while still raising a separate question about whether they are acting as agents or conduits for another person.

11. Legal Permissibility and Anti-Money-Laundering Scrutiny Are Different Systems

A political party's statutory donor-permissibility check is not the same as a bank's anti-money-laundering source-of-funds investigation.

A donor may satisfy the formal electoral-register/company test while a bank still identifies transaction patterns requiring investigation.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

Reform's 2024 experience shows why a serious political-finance control environment needs both concepts: legal donor eligibility and risk-based understanding of where unusually large funds economically originate.

12. Reform's Bank Account Was Frozen During the Election

The Financial Times reported in July 2026 that Reform's account at Arbuthnot Latham was frozen for approximately two weeks around the July 2024 general election while the bank carried out compliance checks.

During the freeze the party could neither send nor receive money through the account.

A'zami subsequently told the Electoral Commission that Reform was initially unable to return an impermissible donation because its bank account was frozen.

The Electoral Commission has independently confirmed that it corresponded with A'zami, as Reform's registered treasurer, about four donations relating to the frozen account; it withheld the confidential correspondence from an FOI request.

The bank has not publicly said why it froze the account. This report therefore does not attribute the freeze to Cottrell, Britain Means Business, Harborne or any particular transaction.

A FROZEN BANK ACCOUNT IS A CONTROL EVENT, NOT A CONVICTION

The freeze is objective evidence that Reform's banking relationship entered enhanced compliance scrutiny at the worst possible time operationally. It does not tell us why the bank acted or establish wrongdoing. What matters for governance is how the party responded, documented the issue and ensured statutory deadlines were still met.

13. Four Donations Required Electoral Commission Clarification

The Electoral Commission's March 2025 FOI response provides unusually useful primary evidence.

It says Reform filed its Q3 2024 donation report on 29 October and confirms that the Commission corresponded with A'zami seeking clarification about four donations connected with the frozen bank account.

The Commission says A'zami supplied details of conversations between the party and its bank, but the material was withheld because it had been supplied in confidence.

That does not indicate that four unlawful donations were found. It establishes that the regulator required clarification on four transactions and that the registered treasurer was the formal compliance contact.

14. An Impermissible Donation Had to Be Returned

The frozen-account episode included at least one donation that Reform itself reported as impermissible and was required to return.

Being sent an impermissible donation is not itself a breach: political parties regularly receive funds they cannot lawfully accept and must return them within the statutory period.

The governance test is whether the party identifies the issue, does not use the funds, returns them correctly and reports the circumstances where required.

Here, the unusual feature is that the bank freeze temporarily prevented the ordinary return process.

15. This Was Not Reform's First Encounter With Donation-Control Risk

The problem has historical context dating back to the Brexit Party's creation.

In 2019 the Electoral Commission examined the party's online fundraising systems after concerns that large or foreign donations could potentially be fragmented into sub-threshold payments.

The Commission concluded that the party faced a high risk of receiving impermissible funds and instructed it to strengthen procedures and review payments where donor identity could not be verified.

That historical episode does not prove the 2024 issues were the same or that earlier recommendations were ignored.

It does mean that source identification and donation controls had been a known institutional risk for the organisation since its first election campaign.

KNOWN RISK SINCE 2019

By 2024 Reform was not a start-up encountering political-finance regulation for the first time. Its predecessor organisation had already been through Electoral Commission scrutiny over donor-identification controls. That raises the governance standard reasonably expected five years later.

16. The 2025 Loan Reclassifications Expose the Central Information Problem

By April 2025 Reform had cleared the remaining debt to Tice/Tisun.

Financial Times reporting says approximately £613,000 was eliminated not through new cash repayment but by reclassifying historic loans as donations.

Reform told the FT that these were individual Tisun loans that had been reclassified and that no money changed hands.

The accounting mechanism is not inherently improper: a permissible lender can agree to convert a loan into a donation, subject to the applicable reporting rules.

The governance problem arises from A'zami's statement that he had not been informed about those reclassifications.

17. Reform's Response and A'zami's Account Point in Opposite Directions

Responding to the Sunday Times reporting, Reform said A'zami had "ultimate responsibility for and complete oversight of the party's finances", controlled the finance team, made the payment and compiled and submitted the reporting.

A'zami, however, told the Financial Times that after the initial £200,000 repayment error he was told not to make further payments and was not made aware of the later loan reclassifications or further repayments made in 2025.

Both statements could contain elements of truth: the registered treasurer can retain ultimate legal responsibility while other senior people make or agree transactions outside his practical knowledge.

If that is what occurred, it is not evidence that the governance system worked. It is evidence of a gap between legal accountability and operational control.

THE CORE GOVERNANCE CONTRADICTION

REFORM'S POSITION: A'zami had complete oversight.

A'ZAMI'S POSITION: he was not told about material reclassifications and later repayments.

The decisive evidence would be payment authorities, board minutes, emails, accounting entries and the audit trail showing who approved what and when.

18. Legal Responsibility Cannot Substitute for Information

PPERA places responsibility on the registered treasurer, but law cannot make an uninformed officer omniscient.

Good governance therefore requires internal rules compelling leaders, lenders, fundraisers and related companies to disclose relevant arrangements to the compliance function before transactions are executed or reported.

If senior figures can independently negotiate loan conversions or receive politically connected funds without timely treasurer visibility, the party is structurally vulnerable to inaccurate reporting even when everyone believes their own piece of the transaction is legitimate.

This is why mature parties separate fundraising enthusiasm from financial acceptance and regulatory reporting.

19. Segregation of Duties Appears Especially Important Here

A robust control system normally separates the person who negotiates a transaction from the person who approves it, pays it and reconciles it.

Reform's small, leader-centred structure created repeated overlaps: Tice could be political leader, lender and owner of related companies; Farage controlled much of the old corporate structure; A'zami was treasurer and company secretary; informal figures such as George Cottrell reportedly operated near the leadership without formal registered responsibilities.

Without segregation, disputes later become contests of memory and blame rather than questions answered by controls.

20. Informal Power Is Hard for Formal Compliance Systems to Police

George Cottrell is a particularly difficult governance case because Reform has said he held no official party role while reporting describes substantial informal access and financial involvement.

A registered treasurer can impose procedures on officers, employees and formal party structures more easily than on an influential external associate who is not formally inside the organisation.

If such a person funds expenses, transfers money to donors, lends money to leaders or participates in leadership negotiations, the party needs rules ensuring those interactions are disclosed to compliance staff.

Otherwise the most consequential financial relationships may sit outside the organisational chart.

21. The Old Constitution Concentrated Appointment Power in the Leader

Reform's pre-democratisation constitution gave the party leader substantial appointment power.

Electoral Commission-released material states that the treasurer was appointed by the leader and was responsible for complying with statutes and Electoral Commission requirements.

The board managed party funds, but the wider organisational structure remained heavily leader-centred.

This creates a classic governance tension: the compliance officer is legally responsible for policing financial conduct while being appointed within a structure dominated by the political leader whose fundraising and strategic decisions may require scrutiny.

22. Independence Is More Important Than Formal Seniority

There is no requirement that a party treasurer be institutionally independent in the same way as an external auditor or regulator.

But parties preparing for government benefit from giving the finance/compliance function authority to stop transactions, demand source documents and escalate concerns without political retaliation.

The available public record does not allow us to determine how much independent authority A'zami actually possessed.

His reported disagreement over payments and eventual departure in February 2025 make that an appropriate subject for further documentary investigation.

23. A'zami Left in February 2025

Companies House records show A'zami resigned as secretary of the old party company on 19 February 2025.

Contemporary later reporting says he left the party after disagreements over handling payments and invoices and returned to his business career in Dubai.

But his departure occurred while Tice-related loan repayments/reclassifications were still being resolved and before the Electoral Commission's March 2025 FOI response identified him as the registered treasurer with whom it had corresponded over the frozen account.

24. Nick Candy Was a Fundraiser, Not Automatically the Registered Treasurer

Reform began calling Nick Candy its treasurer or honorary treasurer after his December 2024 appointment as the senior fundraising figure.

That political title should not automatically be conflated with the statutory registered treasurer under PPERA.

The Electoral Commission's legal regime attaches specific duties to the person formally registered with it; fundraising titles and internal prestige do not transfer those responsibilities by implication.

Part VI should therefore continue to identify the registered treasurer for each transaction date rather than assume Candy legally held the compliance function because press reports called him "treasurer".

TWO TYPES OF "TREASURER"

PARTY/FUNDRAISING TITLE: may describe political status, donor recruitment or honorary responsibility.

REGISTERED TREASURER UNDER PPERA: the named statutory officer responsible for party financial compliance.

They must not be treated as interchangeable without checking the Electoral Commission register.

25. The Financial Scheme Required More Than a Permissibility Tick-Box

Reform's own scheme required accounting processes capable of showing and explaining transactions, not merely checking whether a donor name appeared on an electoral register.

For loans it required records of authorised participants, dates, nature and terms.

For campaign expenditure it required budgeting, monitoring, authorisation and retention of invoices and receipts.

This makes several current controversies testable against Reform's own stated controls rather than against an invented gold standard.

26. The Source-of-Funds Gap Is Partly a Weakness in UK Law Too

It would be unfair to attribute every transparency weakness to Reform alone.

UK political-finance law historically focused heavily on whether the immediate donor was a permissible person or entity. The broader "know your donor" obligation and investigation of the true economic source can be less developed than bank AML controls.

The House of Commons Library's April 2026 review notes Electoral Commission guidance requiring parties to take all reasonable steps to identify the true donor and describes current proposals to strengthen know-your-donor requirements.

The Cottrell case therefore exposes both a party-governance question and a wider regulatory-system weakness.

27. A Small Party Scaling Quickly Faces a Predictable Control Problem

Reform entered the 2024 election with a comparatively small permanent organisation, substantial dependence on a few funders and a sudden national campaign after Farage returned as leader.

Rapid political growth creates financial risk because transaction volume, staff, suppliers and donor interest can increase faster than finance systems mature.

That is not unique to Reform. It is a familiar organisational-growth problem.

But the correct response to rapid scaling is stronger control, not relaxed control — particularly when seven-figure donations and related-party loans are involved.

28. The Governance Failures We Can Actually Test

Control question	Evidence available	Current assessment
Was there a registered treasurer?	Yes — A'zami throughout 2024	ESTABLISHED
Were formal financial procedures documented?	Yes — EC-approved financial scheme	ESTABLISHED

Control question	Evidence available	Current assessment
Did EC communicate with treasurer over frozen-account donations?	Yes — four donations required clarification	ESTABLISHED
Was an impermissible donation identified?	Yes, according to reporting/EC record context	ESTABLISHED; return delayed by freeze
Were large related-party loans documented?	Yes, Tisun loans reported	ESTABLISHED
Were later loan conversions/reclassifications fully known to A'zami?	A'zami says no; Reform says complete oversight	DISPUTED
Did bank compliance interrupt party operations?	Yes — ~2-week freeze	ESTABLISHED; reason confidential
Did unusual related-party/corporate flows occur?	Yes — BMB/Tisun/Cottrell transactions reported	ESTABLISHED AS TRANSACTIONS; legal meaning unresolved
Were true-source checks sufficient?	Active police/regulatory scrutiny; internal records unavailable	NOT YET DETERMINABLE
Was there adequate segregation of duties?	Public evidence shows concentrated/overlapping roles; internal authorisation matrix unavailable	SERIOUS GOVERNANCE QUESTION

31. The Strongest Governance Finding

FORMAL ACCOUNTABILITY WITHOUT VERIFIED PRACTICAL CONTROL

The public record supports a concerning possibility: Reform placed statutory responsibility on a long-serving registered treasurer while material political and financial decisions were also being negotiated by leaders, lenders, donor-connected companies and informal associates around him.

If A'zami truly had complete contemporaneous oversight, records should demonstrate it. If he did not, Reform's governance architecture left one person legally accountable for transactions he says he was not told about.

Either way, the discrepancy requires documentary explanation.

32. What a Governing-Ready Finance Function Would Need

- A documented authority matrix for donations, loans, refunds, loan conversions and related-party transactions.
- Independent source-of-funds escalation for unusually large or complex donations.
- Mandatory disclosure of financial dealings between party leaders, major donors, related companies and informal advisers.
- Two-person or independent approval for related-party payments.
- Beneficiary-account verification for significant transfers.
- Daily bank reconciliation during election periods.
- A single ledger tying Electoral Commission entries to underlying bank transactions and agreements.
- Formal documentation of loan conversion or forgiveness before regulatory reporting.
- Clear separation between fundraising staff and the officer who determines whether money can be accepted.
- Audit committee or equivalent oversight independent of the leader and major lenders.
- Protected escalation for treasurer/compliance objections.
- Documented handover when statutory finance officers leave.

33. The Documents That Would Resolve the Contradiction

- Reform's 2024 finance authority matrix and bank mandate.
- Board minutes approving the Tice repayment schedule and later loan conversions.
- The repayment schedule A'zami says he received.
- Payment instructions for the misdirected £200,000 transfer.
- Emails/messages instructing A'zami to stop further repayments.
- Documents authorising the £613,000 Tisun loan-to-donation reclassification.
- The accounting entries and dates when those reclassifications were recorded.
- Reform's donor due-diligence files for Fiona Cottrell and Britain Means Business.
- The confidential Electoral Commission correspondence concerning the four frozen-account donations, if ever lawfully disclosed.
- A'zami's resignation/hand-over records and the appointment details of his statutory successor.

- External-auditor management letters concerning control weaknesses, if any.

34. A'zami Is Now a Key Witness to the Architecture, Not Just a Name on a Form

The importance of A'zami to this investigation has changed.

Initially he appeared mainly as the registered treasurer whose name established legal responsibility.

Recent reporting makes his actual knowledge a substantive evidential question.

Any first-hand account from A'zami should therefore be tested carefully against contemporaneous documents rather than treated either as automatically exculpatory or as the testimony of a disgruntled former officer.

35. The Party's Defence Also Creates a Testable Claim

Reform's assertion that A'zami had "complete oversight" is unusually useful because it is falsifiable.

Complete oversight should generate records: emails copied to him, approvals, ledger access, board papers, reconciliation reports and signatures or electronic authorisations.

If those records exist, they may substantially weaken the narrative of an informal financial operation.

If major transactions cannot be shown to have passed through the registered treasurer's information and control environment, Reform's own defence becomes evidence of a governance gap rather than an answer to it.

Section 6.12 Verdict

GOVERNANCE VERDICT

Reform UK had a formally documented financial-control system in 2024 and a long-serving registered treasurer with clear statutory responsibility. The problem revealed by the current evidence is not absence of rules on paper. It is uncertainty about whether those rules governed the real movement and reclassification of money around the leadership.

The frozen bank account, regulator queries, related-party company flows, payment error, later loan conversions, source-of-funds investigation and conflicting accounts of the treasurer's knowledge together justify a serious governance concern.

The appropriate classification is:

FORMAL CONTROLS EXISTED + MATERIAL COMPLIANCE EVENTS OCCURRED + PRACTICAL TREASURER OVERSIGHT IS DISPUTED + SEGREGATION/INFORMATION CONTROLS NOT DEMONSTRATED.

That is not proof of deliberate financial misconduct. It is evidence that Reform has not yet demonstrated a finance-control architecture commensurate with the sums, conflicts and institutional responsibility involved in becoming a prospective party of government.

Money And Influence: Mapping Reform UK's Donor Network

6.13 Richard Tice: Leader, Lender, Company Controller and Related-Party Risk

WHY THIS IS ONE CONSOLIDATED TICE CHAPTER

Richard Tice appears repeatedly across the Reform financial record in different capacities: political leader, deputy leader, major lender, controller of Tisun Investments, sole director and controlling person of Britain Means Business, fundraiser, recipient of a personal loan from George Cottrell, and participant in the leadership transition that returned Nigel Farage to the top of the party.

None of those roles is inherently improper. The governance problem is concentration. When one person is simultaneously creditor, senior officer, controller of a donor/fundraising company and participant in decisions affecting the party's liabilities, ordinary transactions become related-party transactions requiring unusually clear documentation, independent approval and disclosure.

This chapter consolidates the Tice evidence already established in 6.11 and 6.12 rather than duplicating it, and adds the remaining material needed to assess the whole structure.

1. Tice Was Not Merely a Donor: He Was Financial Infrastructure

During Reform's early years, Tice's financial support helped keep the organisation operating when it had limited income and substantial liabilities.

Reform's accounts show major sums owed to Tice-linked Tisun Investments. By the end of 2022 the party reported net liabilities exceeding £1.1 million, with approximately £1.083 million outstanding to a director-related lender.

That makes the relationship qualitatively different from an ordinary donor writing occasional cheques. Tice was a creditor whose financial decisions affected Reform's solvency and cash position.

When a political leader is also a major creditor, leadership decisions and financial decisions can become structurally intertwined even without misconduct.

2. The Tice Network in One View

Tice capacity	Entity / relationship	Why it matters
Political leader	Reform UK leader until Farage returned in June 2024; subsequently senior deputy/chair role	Could participate in decisions affecting party liabilities and fundraising
Major creditor	Tisun Investments Ltd loans to Reform	Party owed Tice-linked company >£1m
Company controller	Tisun Investments Ltd	Creditor relationship with party
Fundraising-company controller	Britain Means Business Ltd, formerly Leave Means Leave	Received ~£1.075m from Fiona Cottrell; donated £500k to Reform
Brexit campaign figure	Leave Means Leave co-founder/co-chair	BMB inherited a pre-existing Tice political-campaign vehicle
Private borrower	£80,000 personal loan reported from George Cottrell	Creates separate financial relationship with Farage associate
Leadership negotiator	Discussions with Farage/Cottrell over Farage's return	Reportedly overlapped with resolution of Tice-linked party debt
MP / senior party figure	Post-2024 parliamentary and Reform role	Creates separate parliamentary-interest/disclosure obligations

3. Tisun Investments: The Creditor Relationship

Tisun Investments Ltd is a Tice-linked private company that became a substantial lender to Reform.

The loans were repeatedly reported through Reform's accounts and Electoral Commission records rather than hidden from the public record.

Founder financing is common in young political organisations and is not itself evidence of improper influence.

The governance risk arises because the party's ability to repay, refinance, forgive or convert those liabilities could directly affect a company associated with a senior party leader.

4. A £1m-Plus Creditor Has an Interest in Leadership Stability

A lender owed more than £1 million has a legitimate financial interest in whether the borrower survives and can repay.

When that lender is also the party leader, the distinction between political stewardship and creditor interest becomes unusually thin.

That does not mean Tice made political decisions to recover his money. It means decisions affecting leadership, fundraising and debt should have been recorded with conflict management capable of demonstrating that party interests were considered independently.

The public evidence currently shows the debt and the political overlap, but not the internal conflict-management process.

5. Britain Means Business Was Tice-Controlled

Companies House identifies Richard Tice as the active director of Britain Means Business Ltd and the active person with significant control, holding at least 75% of voting rights.

The company was previously Leave Means Leave, the Brexit pressure group co-founded and co-chaired by Tice.

It therefore did not emerge in 2024 as an independent external donor with no connection to Reform leadership. It was an established Tice-controlled political vehicle repurposed as a Reform fundraising route.

That corporate history is essential when interpreting the £500,000 it donated to Reform during the 2024 election.

6. June 2024: The Most Important Tice Transaction Cluster

As established in 6.11, Fiona Cottrell transferred approximately £1.075 million to Britain Means Business on or around 10 June 2024.

Britain Means Business then made two £250,000 donations to Reform — £500,000 in total — in the run-up to the general election.

The Financial Times reported that a £200,000 repayment connected with the Tisun loan was made on the same day Fiona's money reached Britain Means Business.

These facts create a striking temporal cluster but do not establish that Fiona's money was used for the Tisun repayment. The bank ledger and accounting records would be needed to prove source and use.

THE CORRECT WAY TO STATE THE JUNE 10 EVIDENCE

Fiona Cottrell money entered a Tice-controlled company; that company funded Reform; and a Tice-linked party liability was reduced at approximately the same time.

What is NOT established is that the first transaction financed the third. Temporal proximity is a reason to obtain the ledger, not a substitute for it.

7. The £500,000 Britain Means Business Donations Are Now Under Police Scrutiny

In July 2026 the Metropolitan Police investigation expanded to examine the two £250,000 donations made to Reform by Britain Means Business before the 2024 election.

> ***Applying the Part VI Evidential Standard, this section distinguishes documented donation, access, association and policy alignment from any stronger claim of causal influence; only case-specific evidence is discussed below.***

Its significance is that the corporate route itself is now part of the official source-of-funds investigation rather than merely a journalistic question.

Tice has denied wrongdoing and has said the money paid into Britain Means Business came from Fiona Cottrell.

8. The Economic Source Behind BMB Is the Key Question

Electoral Commission records identify Britain Means Business as the immediate donor to Reform.

Later reporting identifies Fiona Cottrell as the immediate source of the large payment into BMB, while separate banking evidence reportedly shows substantial transfers from George Cottrell to Fiona beforehand.

This creates three layers: reported economic source upstream; Fiona as sender to BMB; and BMB as registered donor to Reform.

The legality depends on facts about ownership, intention, agency and permissibility that remain under investigation. Tice's role matters because he controlled the company at the centre of that chain.

9. Bankers Asked Tice About the Origin of the Money

Guardian reporting says bankers queried Tice about the origin of the approximately £1 million entering Britain Means Business.

The transfer route through the UK account of Australian money-exchange service Oneify also attracted compliance scrutiny.

Bank staff reportedly filed suspicious activity reports concerning several connected transactions.

A SAR is not a criminal finding. But the fact that financial institutions escalated the transaction independently strengthens the case for examining BMB's source-of-funds controls rather than treating the route as routine fundraising.

10. The Personal £80,000 George Cottrell Loan Creates a Separate Tice–Cottrell Link

George Cottrell reportedly lent Tice £80,000 in late 2024. Tice described it as a personal bridging loan.

Reporting says banking compliance staff raised questions because the loan occurred around a property transaction and other political-finance activity.

The Guardian has also raised the question of whether the terms or political connection required parliamentary registration. The applicable Commons rules turn on whether a benefit relates to parliamentary or political activity and whether any concessionary element exists.

KEEP THE TWO COTTRELL RELATIONSHIPS SEPARATE

FIONA → BMB: large payment into Tice-controlled fundraising company.

GEORGE → TICE: separate reported £80,000 personal bridging loan.

The existence of both relationships increases network density. It does not prove they were coordinated.

11. The Farage Leadership Transition Is Where Politics and Debt Most Clearly Meet

Recent reporting says Farage, Tice and George Cottrell discussed Farage returning to the Reform leadership before the public June 2024 announcement.

The Sunday Times and Financial Times reporting links those discussions to arrangements for resolving more than £1 million of money owed to Tice's company.

Farage has since acknowledged that discussions about his return occurred earlier than some of his initial public explanations suggested, while Reform disputes the more conspiratorial characterisation of a secret pre-arranged deal.

The important governance fact is narrower: negotiations over political leadership reportedly overlapped with negotiations concerning a major liability owed to the outgoing leader's company.

12. That Does Not Make the Leadership Deal Corrupt

A political founder can legitimately agree to step aside while arranging repayment of money genuinely owed to him.

Indeed, resolving a large related-party debt during a leadership transfer may be prudent.

The problem arises if the financial terms are undocumented, if the registered treasurer is excluded, or if repayment/conversion is made contingent on political decisions without transparent approval.

13. The £200,000 Repayment Error Matters Because It Tests Controls

Former registered treasurer Mehrtash A'zami says the first £200,000 repayment under the Tice schedule was accidentally sent to the wrong account.

He says he was subsequently told not to make further payments.

The mistake itself may be mundane. But six-figure related-party payments should normally have beneficiary verification, dual approval and reconciliation precisely because errors and conflicts are foreseeable.

This episode is therefore better understood as a control test than as evidence of dishonesty.

14. Most of the Remaining Tice Debt Was Apparently Converted, Not Paid

By April 2025 Reform had cleared its remaining debt to Tice/Tisun.

Financial Times reporting says approximately £613,000 was eliminated by reclassifying historic Tisun loans as donations rather than transferring new cash.

Reform says these were individual loans reclassified as donations and that no money changed hands.

Loan forgiveness or conversion can be legitimate political support, but it changes the transaction from creditor repayment to donor funding and therefore requires accurate permissibility and reporting treatment.

15. A'zami Says He Was Not Told About the Reclassifications

This remains one of the most important pieces of governance evidence in the Tice story.

A'zami says he was unaware of the later loan reclassifications and further 2025 repayments.

Reform says he had complete oversight and ultimate responsibility for party finances.

As 6.12 explains, those accounts can only be resolved by the audit trail. If the registered treasurer was not informed of a £613,000 related-party loan conversion, the control failure is material even if the conversion itself was lawful.

16. Tice's Position Was Therefore Both Creditor and Donor

Once Tisun loans were converted into donations, the economic relationship changed.

Tice's company ceased to be entitled to repayment of the converted amounts and instead effectively provided political funding to Reform.

That makes Tice's overall support a mixture of historic credit, direct or corporate political funding, fundraising-company activity and political leadership.

For transparency, those categories should be reported separately rather than collapsed into a single headline such as "Tice donated £X".

17. Leave Means Leave Adds Historical Context, Not Evidence of Impropriety

Britain Means Business began as Leave Means Leave, the Brexit campaign organisation led by Tice and John Longworth, with Farage also closely associated with the campaign.

The corporate continuity demonstrates that Tice's fundraising relationship with Farage predates Reform's current structure.

It also means BMB's use as a Reform funding vehicle grew out of an established political network rather than an arm's-length commercial company discovering Reform in 2024.

That is relevant to network analysis but not inherently suspicious.

18. Tice's Business Background Explains His Capacity to Fund the Party

Tice is a long-established businessman and property investor with a career in real estate and asset management.

His ability to lend substantial sums to Reform therefore has an identifiable commercial background and should not be portrayed as unexplained wealth.

The appropriate investigation is not "where did Tice get any money?" but the much narrower question of how his private companies, personal finances and party responsibilities interacted.

This distinction keeps the chapter focused on governance rather than insinuation.

19. Related-Party Risk Is the Correct Analytical Framework

In corporate governance, a related-party transaction is not automatically improper. It is a transaction where relationships create a risk that normal arm's-length assumptions may not apply.

Tice's loans to Reform, Reform's repayments to Tice-linked entities, BMB donations, and any agreements negotiated while Tice held senior party office fit that analytical concern even though political parties are not ordinary commercial companies.

The appropriate safeguards are disclosure, documented terms, independent approval, accurate accounting and management of conflicts.

The question for Reform is therefore not whether related-party transactions existed — they plainly did — but whether the safeguards were adequate.

20. The Conflict Matrix

Transaction / decision	Tice role 1	Tice role 2	Governance safeguard needed
Tisun lends Reform money	Company controller / economic stakeholder	Party leader/senior officer	Written terms; treasurer reporting; conflict disclosure
Reform repays Tisun	Creditor-side interest	Senior party figure	Independent payment approval; reconciliation
Tisun loan converted to donation	Creditor waiving repayment	Party supporter/senior figure	Permissibility check; written conversion; regulatory reporting
BMB receives Fiona money	BMB controller	Senior Reform fundraiser/officer	Source-of-funds review; corporate ledger

Transaction / decision	Tice role 1	Tice role 2	Governance safeguard needed
BMB donates £500k to Reform	Donor-company controller	Senior Reform figure	Independent acceptance/permissibility review
Farage leadership negotiations	Outgoing leader / senior figure	Major creditor	Documented conflict management; board/treasurer visibility
George lends Tice £80k	Private borrower	MP/senior Reform figure connected to lender's political network	Clear terms; parliamentary-interest assessment

21. The Strongest Point Is Concentration, Not a Single Smoking Gun

No single publicly established Tice transaction currently proves corruption.

The concern comes from accumulation: party leadership, creditor status, control of the fundraising company, overlapping Cottrell relationships, debt negotiations during leadership transition, loan conversions and disputed treasurer visibility.

Each can have a legitimate explanation.

Together they create a governance environment in which independent controls are essential because too many decisions touch the interests of the same senior individual.

THE TICE PROBLEM IN ONE SENTENCE

The evidence does not show that Richard Tice unlawfully extracted money from Reform; it shows that Reform repeatedly conducted politically important financial business through structures in which Richard Tice occupied more than one side of the relationship.

22. What the Police Investigation Changes

The expansion of the Metropolitan Police inquiry to Britain Means Business means the BMB route can no longer be treated merely as an interesting accounting arrangement.

Police scrutiny still does not imply guilt, and the precise offences or individuals ultimately in scope may change.

For this report, it upgrades the BMB source-of-funds question from a media-led governance lead to an active law-enforcement matter.

The correct response is greater precision, not stronger accusation.

23. What the NCA/SAR Reporting Changes

Separate from the Met investigation, banks reportedly filed suspicious activity reports concerning BMB/Cottrell-related flows and the George-to-Tice personal loan.

SARs reflect a regulated institution's judgment that activity merits intelligence scrutiny; they are not findings that money laundering occurred.

Their evidential value is therefore limited but real: independent compliance professionals identified unusual features in multiple Tice-connected transactions.

That strengthens the argument for obtaining underlying records while leaving criminal conclusions to investigators.

24. Tice's Defences Must Be Recorded

Tice and Reform have denied wrongdoing and criticised reporting around the party's finances.

Tice has said Fiona Cottrell was a permissible donor and has explained the George Cottrell payment as a personal bridging loan.

Reform has characterised the Tisun reclassifications as legitimate conversions of individual loans into donations and says A'zami had complete oversight.

These explanations are part of the evidence and should be tested against records rather than dismissed because they come from interested parties.

25. What We Can Say Safely

- Tice and his companies provided substantial financial support to Reform over several years.
- Tisun Investments was a major Reform creditor, with more than £1 million outstanding at points in the party's development.
- Tice controls Britain Means Business, formerly Leave Means Leave.
- BMB donated £500,000 to Reform shortly after receiving approximately £1.075 million from Fiona Cottrell.
- The Met is investigating the BMB donations; no wrongdoing has been established.
- A £200,000 Tice-related party-loan repayment occurred around the same time as the BMB/Cottrell funding cluster.
- Approximately £613,000 of historic Tisun loans were later reclassified as donations, according to FT reporting.
- A'zami says he was not told about material later reclassifications; Reform says he had complete oversight.
- George Cottrell reportedly provided Tice with a separate £80,000 personal bridging loan.
- Farage's return to leadership was discussed with Tice before June 2024, and reporting links the transition discussions with resolution of Reform's Tice-linked debt.

26. What We Cannot Say

- That Fiona Cottrell's £1.075 million paid Tice's £200,000 loan repayment.
- That Tice knowingly accepted money from an impermissible donor.
- That Britain Means Business was an illegal conduit.

- That Tice sold the Reform leadership to Farage in exchange for repayment.
- That the Tisun loan conversions were unlawful.
- That the £80,000 George Cottrell loan was political or improperly undeclared.
- That any suspicious activity report establishes money laundering.
- That A'zami's account is necessarily more accurate than Reform's without the underlying records.

27. Evidence That Would Materially Upgrade the Case

- BMB bank statements tracing the £1.075 million receipt and all same-day/nearby outflows.
- Tisun bank statements showing receipt and beneficial use of the £200,000 repayment.
- The original Tisun loan agreements and repayment schedule.
- Written agreements converting approximately £613,000 of Tisun debt into donations.
- Board minutes or correspondence connecting Farage's leadership return to debt resolution.
- Communications showing Tice knew or was told that Fiona's BMB payment economically originated with George Cottrell.
- Terms of the £80,000 George-to-Tice loan and evidence relevant to whether it constituted a registrable political benefit.
- Records showing who independently approved BMB's donations to Reform and Reform's acceptance of them.

28. Evidence That Would Weaken the Case

- Contemporaneous records showing the June BMB receipt and Tisun repayment were economically unrelated and funded from clearly separate balances.
- Independent treasurer/board approval of every Tice-related transaction with complete conflict declarations.
- Clear documentation showing A'zami had contemporaneous knowledge of the loan conversions despite his later recollection.
- Bank/source-of-funds records demonstrating BMB had lawful beneficial ownership of the donated funds and was not acting as another donor's agent.
- Loan documents showing George Cottrell's £80,000 payment was an ordinary arm's-length personal loan unrelated to political activity.

29. Tice Should Not Be Treated as Just Another Mega-Donor

Harborne, Haidar and Candy are principally examined as external wealth entering the party and potentially creating access or policy alignment.

Tice is structurally different. His money helped finance the organisation while he simultaneously exercised formal political power within it.

That means the relevant risk is less "donor buys access" than "insider financial dependence and related-party governance".

Keeping those categories separate makes the report analytically stronger and avoids forcing every financial relationship into the same corruption template.

30. The Consolidated Tice Verdict

SECTION 6.13 VERDICT

Richard Tice was not simply a wealthy supporter of Reform. He was part of the party's financial architecture: leader, major creditor through Tisun, controller of Britain Means Business, participant in fundraising and leadership decisions, and later a borrower from a politically connected Farage associate.

The public record shows substantial and repeated related-party transactions. It also shows a payment error, disputed treasurer knowledge, loan-to-donation reclassifications, bank/NCA scrutiny of connected flows and an active police investigation into BMB donations.

None of that establishes that Tice committed a criminal offence or improperly profited from Reform.

The defensible conclusion is:

HIGH RELATED-PARTY CONCENTRATION + MATERIAL CONFLICT-OF-INTEREST RISK + INCOMPLETE PUBLIC AUDIT TRAIL + ACTIVE SCRUTINY — NO PROVEN QUID PRO QUO, UNLAWFUL EXTRACTION OR CRIMINAL LIABILITY.

For a party presenting itself as ready to govern, the unresolved issue is institutional: whether decisions involving a senior officer's own companies and financial interests were independently controlled, documented and reviewable.

Money And Influence: Mapping Reform UK’s Donor Network

6.14 Part VI Synthesis: What the Donor Network Actually Shows

THE PART VI CONCLUSION

Part VI does NOT establish a single hidden conspiracy in which Reform’s donors collectively purchased the party or dictated its programme. The evidence is more specific — and more defensible.

It identifies three different governance risks that should not be conflated: EXTERNAL DONOR INFLUENCE, where large funders obtain access and sometimes align closely with policy; SOURCE-OF-FUNDS RISK, where the economic origin of political money may differ from the registered route and is now under police investigation; and INSIDER RELATED-PARTY RISK, where senior Reform figures simultaneously occupy political, creditor, corporate and fundraising roles.

The strongest individual influence chain is Christopher Harborne on cryptocurrency regulation. The strongest documented donor-policy preference is Bassim Haidar on non-dom taxation and the later Britannia Card. The strongest source-of-funds issue is the Fiona/George Cottrell and Britain Means Business chain. The strongest insider-governance concentration is Richard Tice. Nick Candy is best evidenced as the bridge that converted established wealthy Conservative donors into Reform funders.

Those findings are serious without needing to claim more than the evidence proves.

1. Five People, Five Different Evidential Problems

Figure	Primary role in Part VI	Strongest established evidence	What remains unproved
Christopher Harborne	Mega-donor / Farage financial supporter	Exceptional funding concentration; direct Farage benefits; crypto interests; Farage parliamentary intervention aligned with crypto-regulatory concerns	That Harborne instructed Farage or purchased the intervention
Nick Candy	Fundraiser / donor-network bridge	Documented recruitment of wealthy donors including Haidar; high-level donor access and fundraising role	That Candy sold policy access or designed policy for donors
Bassim Haidar	Converted donor with explicit tax preference	Public pre-policy opposition to non-dom abolition; £1m pledge; repeated donations; direct Farage travel support; later Britannia Card alignment	That Haidar was consulted on, authored or caused the Britannia Card
Fiona / George Cottrell	Source-of-funds case	Large George→Fiona transfers reported before Fiona's Reform-related payments; active Met investigation; BMB route	That George was legally the true donor or that concealment was intentional

Figure	Primary role in Part VI	Strongest established evidence	What remains unproved
Richard Tice	Insider creditor / company controller	>£1m creditor relationship; BMB control; loan conversions; overlapping leadership/debt relationships; disputed treasurer visibility	That Tice unlawfully profited, knowingly accepted impermissible funds or traded leadership for repayment

2. The Harborne Case Reaches Furthest Up the Influence Ladder

Harborne's importance comes from the combination of scale, access, commercial interest and observable political action.

He is not merely Reform's largest known financial supporter. His support has extended directly to Farage, while his business/investment interests include cryptocurrency and related technology.

Farage subsequently made a parliamentary intervention on cryptocurrency regulation that aligned with concerns relevant to that sector.

That produces a stronger chain than simple donor-policy coincidence: MONEY → INTEREST → ACCESS → POLITICAL ACTION → ALIGNMENT.

The missing link remains causation. No evidence reviewed in this report shows Harborne instructing Farage, conditioning funding or receiving a promised regulatory outcome.

3. Haidar Provides the Cleanest Documented Preference-to-Policy Sequence

Haidar is evidentially valuable because he publicly described what he wanted before Reform announced the relevant policy.

He opposed abolition of non-dom treatment, said the change would cost him millions, described proposing a £200,000 flat-charge alternative and later said Farage might create a new non-dom regime.

After Candy brought him into Reform's donor environment, Haidar pledged substantial funding. Reform then launched the Britannia Card.

The sequence creates strong circumstantial alignment but still lacks evidence that Haidar participated in drafting or consultation.

That distinction should remain one of the report's clearest examples of how to separate documented preference from unproved influence.

4. Candy's Importance Is Network Conversion, Not Yet Policy Control

Candy's most demonstrable contribution is the construction of a wealthy donor pipeline.

He used an existing high-net-worth network to bring Conservative and internationally mobile donors into direct contact with Reform leadership.

Haidar is the clearest successful conversion; Mohamed Amersi provides another documented example.

Harborne's relationship predates Candy, while other large donors cannot responsibly be attributed to Candy without evidence.

The current record therefore supports calling Candy a donor-network bridge, not the proven architect of Reform's policy programme.

5. The Cottrell Case Is Not Primarily About Policy Influence

The Fiona/George Cottrell evidence raises a more fundamental transparency question: whose economic money entered the political system?

Fiona is the registered donor of substantial Reform funding and the sender of approximately £1.075 million to Britain Means Business.

Later banking-record reporting says George transferred more than $2 million to Fiona before major Reform-related payments, and the Metropolitan Police investigation now encompasses relevant donations.

That is enough to justify serious source-of-funds scrutiny.

It is not enough to state that Fiona was a front, that George was the true legal donor, or that electoral law was deliberately evaded.

6. Tice Is a Governance Case Rather Than an External-Donor Case

Tice's money cannot be analysed in the same way as Harborne's or Haidar's because Tice exercised formal political power inside Reform while also financing it.

His companies lent money to the party; one controlled a major fundraising route; debt resolution overlapped with leadership change; and later loan-to-donation conversions occurred while the registered treasurer's knowledge is disputed.

This is classic related-party risk: the concern is not that a stranger bought access, but that one insider occupied multiple sides of financially consequential relationships.

The appropriate safeguards are independent approval, conflict management, accurate reporting and an audit trail.

7. Three Risk Categories Explain the Network Better Than "Corruption"

Risk category	What it means	Primary cases	Evidence level
External donor influence	Wealth creates access; donor interests/preferences align with political action or policy	Harborne; Haidar; Candy network	Strong access/alignment evidence; causation generally unproved

Risk category	What it means	Primary cases	Evidence level
Source-of-funds risk	Registered route may not reveal the ultimate economic source or arrangement	Fiona/George Cottrell; Britain Means Business	Strong red flags + active investigation; legal true-donor finding unresolved
Insider related-party risk	Senior political figure is also lender/company controller/financial counterparty	Tice / Tisun / BMB	Transactions established; adequacy of controls and conflicts unresolved

WHY THIS DISTINCTION MATTERS

Using one word — "corruption" — would actually weaken the report. It would collapse different legal and governance problems into an allegation broader than the evidence.

The three-risk model is stronger because each category has its own evidential test and its own missing documents.

8. The Evidence Is Strongest on Access

Across Part VI, the proposition most firmly supported is that substantial wealth buys proximity to Reform's leadership.

High-value dinners, donor events, direct travel support, private relationships and repeated large contributions provide multiple documented routes of access.

Access is not corruption. Political parties legitimately meet donors.

But concentrated donor access becomes democratically important where the same people possess large financial interests affected by the policies being developed.

9. Policy Alignment Is Also Demonstrable — but Unevenly

Several donor interests align with Reform positions, but the evidential quality varies.

Haidar's tax preference is exceptionally well documented in his own pre-policy statements.

Harborne's crypto alignment is stronger because Farage took identifiable parliamentary action in a field relevant to Harborne's interests.

Other overlaps identified in earlier sections remain monitoring leads rather than evidence of influence because the donor preference, access or political-action link is missing.

The report should preserve those differences rather than count every policy overlap equally.

10. Causation Is the Missing Link in Most Cases

Part VI repeatedly reaches the same evidential boundary: money, interest, access and alignment can often be established, while causation cannot.

That is not a failure of the investigation. It is the correct boundary between circumstantial evidence and proof.

Political influence usually occurs privately through conversations, drafts, messages, meetings and informal advice. Public donation registers rarely reveal that layer.

The documents capable of moving a case from alignment to causation are therefore consultation records, correspondence, policy drafts and explicit conditions attached to funding.

EVIDENTIAL RULE
“Could benefit” is not the same as “caused”. “Had access” is not the same as “bought access”. “Aligned policy” is not evidence that a policy was written for a donor without the missing evidential link.

11. Reform’s Funding Concentration Is Itself a Governance Issue

Even without proving donor-specific policy influence, dependence on a small number of very wealthy supporters creates structural risk.

Large donors can become unusually important to organisational survival, election spending and leadership strategy simply because replacing their funding is difficult.

That can create anticipatory influence: politicians may understand donor preferences without any explicit instruction being given.

Anticipatory influence is a recognised governance concern but is intrinsically difficult to prove in an individual case. The report should describe the structural incentive rather than claim private motivation.

12. The Party’s Corporate History Makes Financial Analysis More Complex

Reform’s unusual development through corporate entities, predecessor structures and leader-controlled arrangements complicates the ordinary public understanding of party finance.

Part IV already distinguishes the political party from the companies through which aspects of its organisation were historically constituted.

Part VI adds another layer: Tice-controlled companies, fundraising vehicles and personal/party financial relationships.

Diagrams and concise entity labels distinguish the legal person that sent or received each payment, avoiding the misleading assumption that “Reform” represents a single bank account or company.

13. The Regulators and Banks Are Now Part of the Evidence

This investigation is no longer based solely on press speculation and public donation registers.

The Electoral Commission has confirmed correspondence over Reform transactions and made a referral to police.

The Metropolitan Police are actively investigating relevant donations.

Banks independently escalated some transactions through compliance procedures, while Reform's bank account was frozen temporarily during the 2024 election.

None of those events establishes guilt. Collectively, they demonstrate that the financial questions identified in Part VI are sufficiently substantive to have triggered formal institutional scrutiny.

14. Reform's Defences Are Also Testable Evidence

Reform, Farage, Tice and the relevant donors have denied wrongdoing in various contexts and supplied explanations for several transactions.

Those denials should not be treated as obstacles to the investigation; they create propositions that can be tested.

Claims of complete treasurer oversight can be checked against audit trails. Claims that funds belonged to a particular donor can be checked against bank records. Claims that loans were ordinary commercial arrangements can be checked against written terms.

A rigorous report is strengthened by identifying what evidence would confirm the subjects' explanations as well as what would undermine them.

15. The Strongest Findings Ranked

Rank	Finding	Why it ranks highly
1	Harborne: money + access + relevant commercial interest + Farage crypto intervention	Contains observable political action, not merely policy similarity
2	Haidar: explicit pre-policy non-dom preference + Candy conversion + major funding + Britannia Card alignment	Preference documented before policy launch
3	Cottrell/BMB: reported upstream money + registered/onward political flows + police investigation	Source-of-funds issue supported by banking reporting and official investigation
4	Tice: creditor + company controller + senior officer + disputed treasurer visibility	Dense related-party structure with established transactions

Rank	Finding	Why it ranks highly
5	Candy: documented high-net-worth donor recruitment	Strong network evidence; weaker evidence of donor-specific policy influence

16. What Part VI Does Not Establish

- That Reform UK is controlled by its donors.
- That any donor purchased a specific policy.
- That Harborne directed Farage's parliamentary activity.
- That Haidar designed the Britannia Card.
- That Fiona Cottrell was a straw donor.
- That George Cottrell committed a political-finance offence.
- That Tice unlawfully profited from Reform or sold the leadership.
- That Candy promised policy influence in return for donations.
- That suspicious activity reports or police interviews prove criminality.

17. What Part VI Does Establish

- Reform has attracted unusually large funding from a relatively small number of wealthy individuals and connected entities.
- Major donors have obtained documented proximity to senior Reform leadership.
- Some donor commercial or personal interests align closely with Reform policy or political interventions.
- At least one donor — Haidar — publicly stated a relevant policy preference before the aligned Reform policy appeared.
- The Cottrell/Britain Means Business funding route now raises an active official source-of-funds question.
- Tice's overlapping political, creditor and corporate roles create substantial related-party governance risk.
- Reform's formal financial controls existed, but the practical visibility of its registered treasurer over material transactions is disputed.
- Banks, the Electoral Commission and police have all scrutinised aspects of the financial network.

18. The Missing Documents Across Part VI

- Donor-policy consultation records.
- Farage/Harborne correspondence concerning cryptocurrency policy.
- Haidar/Candy/Farage correspondence concerning non-dom or Britannia Card policy.
- The Britannia Card authorship and drafting trail.
- George/Fiona Cottrell source-of-funds banking chronology.
- Britain Means Business's June 2024 ledger and bank statements.
- Tisun loan agreements, repayment schedule and loan-to-donation conversion documents.
- Reform's donor due-diligence files and transaction-approval records.
- The audit trail resolving A'zami's claimed lack of knowledge.
- The eventual Metropolitan Police and Electoral Commission findings.

19. A Provisional Network Assessment

Dimension	Assessment
Funding concentration	HIGH — large reliance on wealthy individuals/entities is well documented
Leadership access	HIGH — repeated direct donor access and support documented
Policy-interest overlap	MEDIUM-HIGH — strong in selected cases, weak/speculative in others
Documented donor policy preference	HIGH in Haidar case; variable elsewhere
Observable aligned political action	HIGH in Harborne crypto case; less direct elsewhere
Proven donor causation	LOW / NOT ESTABLISHED
Source-of-funds transparency risk	HIGH in Cottrell/BMB case; under active investigation
Related-party governance risk	HIGH in Tice structure
Evidence of criminal liability	NOT ESTABLISHED in this report
Need for further disclosure	VERY HIGH

20. The Democratic Question Is Larger Than Criminality

A political-finance system can raise serious democratic concerns without anyone committing a criminal offence.

The relevant questions include who receives private access, whose interests are heard during policy development, whether parties can independently scrutinise their own financiers, and whether voters can identify the economic source of political money.

Criminal law sets a minimum boundary. Governance standards for a party seeking national power should be higher.

Part VI therefore evaluates transparency, conflicts and influence risk as well as legal compliance.

21. The Best Overall Characterisation

PART VI VERDICT

The evidence does not support describing Reform UK as a proven donor-controlled party. It does support describing it as a party with a HIGH-CONCENTRATION FUNDING MODEL in which a small number of wealthy individuals and related entities have obtained substantial access to leadership, where several donor interests closely intersect with policy, and where parts of the financial network now raise unresolved source-of-funds and related-party governance questions.

The strongest influence evidence stops short of quid pro quo. The strongest source-of-funds evidence is under active police investigation. The strongest insider-finance evidence shows concentration and inadequate publicly demonstrated safeguards rather than proven unlawful enrichment.

That distinction should govern the tone of the final report: serious, forensic and difficult to dismiss precisely because it does not overstate what has been proved.

SOURCE NOTE — Detailed Part VI source registers and supplementary evidential summaries are available in the Evidence & Sources Compendium. Core donor records, network evidence, case-specific analysis and cumulative Part VI findings remain in the main report.

PART VII

Policy Formation: The Machinery Behind Reform's Programme

THE QUESTION PART VII WILL TEST

Parts IV–VI have established three separate questions: whether Reform has the organisational capacity to govern; whether a flagship programme survives contact with legal and operational reality; and how money, access and influence operate around the party.

Part VII examines the machinery between those questions: WHO actually turns an idea into Reform UK policy, WHO tests it, WHO can challenge it, WHO prepares legislation, and WHAT evidence exists that proposals have been costed, legally reviewed and administratively stress-tested before they are presented as a programme for government.

7.1 Who Actually Makes Reform UK Policy?

1. Reform Now Publicly Identifies a Head of Policy

Reform UK's current website identifies James Orr as "Head of Policy". That is an important change from the looser policy machinery visible during earlier phases of the party.

Orr took over the role in February 2026 after Zia Yusuf, who had previously held the policy brief, moved into the party's newly presented "Shadow Home Secretary" role.

The appointment therefore gives Reform an identifiable central policy officer. It does not, by itself, tell us how much authority the role possesses, what internal committees approve policy, or what independent fiscal and legal challenge exists.

2. James Orr Is Not Operating Alone

Orr has publicly described his task as building a policy operation that supports Reform's shadow team and works alongside Danny Kruger.

Kruger heads Reform's "Preparing for Government" operation, a separate but overlapping structure concerned with how a future Reform administration would exercise power and implement its programme.

This creates at least two identifiable policy/government-preparation centres: Orr's policy function and Kruger's implementation/constitutional-preparation function.

That is more institutional infrastructure than Reform possessed when it fought the 2024 election. The relevant question is now how these centres interact and where final authority lies.

Function	Named figure / structure	Publicly evidenced role	Unresolved question
Central policy development	James Orr	Reform website: Head of Policy	What formal authority does the post have over spokespeople and policy announcements?
Preparing for government	Danny Kruger / PrepGov	Published programme on state machinery and government readiness	Does PrepGov test policy deliverability or primarily design machinery to execute predetermined policy?

Function	Named figure / structure	Publicly evidenced role	Unresolved question
Home affairs policy	Zia Yusuf	Presented by Reform as Shadow Home Secretary	How does a non-MP shadow office interact with parliamentary scrutiny and the central policy unit?
Economic policy	Robert Jenrick	Presented as Shadow Chancellor	Who owns fiscal costing and what external/independent validation is used?
Party leadership	Nigel Farage / Party Board	Leader and formal governance structures	Which body has final policy sign-off, and is that process recorded?

3. The Constitution Gives Members a Voice — But the Public Policy Pipeline Is Still Opaque

Reform's 2024 constitutional changes were explicitly sold as democratising the party. The conference resolution said the constitution would create branch and regional structures and allow members to vote on issues important to them and the direction of the party.

Contemporary reporting on the constitutional change likewise described new rights for members to debate and agree policy.

That establishes a formal aspiration toward member participation. It does not yet provide a publicly transparent policy-production workflow comparable to an organisation chart showing proposal → evidence review → costing → legal review → member/board approval → publication.

For this investigation, the distinction between the right to debate policy and the power to originate or approve policy is crucial.

FIRST STRUCTURAL FINDING

Reform now has identifiable policy personnel and a more democratic constitution, but the PUBLICLY VISIBLE CHAIN OF POLICY AUTHORITY remains incomplete. We can identify people who write, advocate and prepare. We cannot yet identify, from published material alone, a consistently documented sign-off system showing who independently tests and finally authorises each major commitment.

4. "Shadow Home Secretary" Is a Party Title, Not a Parliamentary Office

Reform currently presents Zia Yusuf as its "Shadow Home Secretary". Yusuf is not an elected Member of Parliament.

There is nothing inherently unlawful or constitutionally impossible about a political party giving a non-MP a shadow or spokesperson title. Political parties are free to organise their internal teams.

But the title should not be confused with membership of His Majesty's Official Opposition shadow cabinet, nor does it give Yusuf the parliamentary rights, duties or accountability mechanisms of an MP.

This matters for policy formation because Reform is deliberately presenting a government-in-waiting structure whose personnel do not necessarily map onto parliamentary offices.

WHY THE YUSUF POINT MATTERS

The issue is not that Reform is "forbidden" from calling Yusuf Shadow Home Secretary. It is that the title can create an impression of Westminster equivalence that does not exist.

A non-MP cannot question ministers from the Commons, vote on legislation, sit in the Commons by virtue of that party title, or be scrutinised through the same parliamentary mechanisms as an elected shadow spokesperson. For a party claiming readiness for government, the distinction between PARTY BRANDING and PARLIAMENTARY CAPACITY is material.

5. Reform Claims It Is Preparing Legislation Before Taking Office

Yusuf said in June 2026 that Reform intended to enter government with "thousands of pages of primary legislation" ready for its first year.

That is a much more concrete claim than saying the party has broad policy aspirations. Draft primary legislation requires detailed decisions about powers, definitions, enforcement, transitional arrangements, compatibility with existing statutes and often expenditure.

If the claim is literal, Reform should now possess a substantial body of draft legislative material and a network of lawyers and subject specialists capable of producing it.

That creates an unusually testable research question for Part VII: what legislation exists, who drafted it, who reviewed it, and how far has it been subjected to independent legal and implementation challenge?

6. Lawyers for Reform Provides One Identifiable External Expertise Network

Lawyers for Reform launched in March 2026 and describes itself as a group of barristers, solicitors, legal academics and others supportive of Reform's political mission.

Danny Kruger participated in its launch in his Preparing for Government capacity.

Such a network could provide Reform with legal expertise that a relatively small parliamentary party would otherwise struggle to maintain internally.

But supportive professional networks are not equivalent to independent legal assurance. Part VII should distinguish lawyers helping a party achieve a desired policy from lawyers tasked with identifying why a proposal may be unlawful, vulnerable or unworkable.

7. The Centre for a Better Britain Shows That Policy Development Also Occurs Outside the Party

The Centre for a Better Britain emerged as an external organisation working on policy and constitutional ideas associated with a possible Reform government.

Financial Times reporting described its work on changes to the civil service, judiciary, human-rights framework, fiscal policy and energy, while stressing its links to figures around Reform.

James Orr was associated with that wider intellectual network before becoming Reform's Head of Policy.

This does not mean external think tanks secretly write Reform policy. It does mean that any serious map of policy formation must extend beyond the formal party payroll.

8. Danny Kruger's Preparing for Government Programme Is Already Publishing Institutional Blueprints

Kruger's Preparing for Government work is not merely rhetorical. Its published material sets out a diagnosis of the British state and proposals for restructuring the machinery of government.

The programme therefore occupies an unusual position: it is simultaneously policy development, implementation planning and constitutional design.

That overlap matters because a conventional policy process normally separates the political objective from legal advice, fiscal analysis and implementation planning sufficiently to allow each to challenge the others.

Part VII should test whether Reform's structure creates genuine challenge or whether policy development and implementation design are being built around the same predetermined assumptions.

9. A Recent Farming Dispute Gives Us a Useful Window Into the Process

In March 2026, reporting on Reform farming adviser Clive Bailye described him as having played an important role in shaping agricultural policy while he publicly advocated measures that critics said could substantially increase wheat prices.

Reform responded that Bailye was one of several contributors and that final policy was determined through formal internal processes, with James Orr leading policy development.

That response is useful because Reform itself asserts that a formal internal process exists.

The obvious next evidential task is therefore to identify that process: who the "several contributors" are, what body resolves disagreement, what evidence is required, and who signs off the final version.

TRANSPARENCY TEST
When Reform says an adviser is only “one of several contributors” and that policy is settled through “formal internal processes”, that claim can be tested by asking what those processes are. If the process is robust, documenting it would strengthen Reform’s case. If it cannot be described beyond personalities and informal networks, that becomes relevant to the governance assessment.

10. The Emerging Policy Network Is More Sophisticated Than the 2024-Era Party

It would be inaccurate to freeze Reform in its 2024 organisational state and claim it still has virtually no policy infrastructure.

By 2026 it publicly identifies a Head of Policy, a Preparing for Government operation, a shadow portfolio structure, supportive legal networks, specialist advisers and external think-tank activity.

The investigation therefore needs to assess quality rather than merely existence.

The key questions are independence, competence, transparency, challenge, documentation and the ability to reconcile ambitious political promises with law, money and administrative reality.

11. But the Public-Facing Structure Still Appears Personality-Led

Reform’s website foregrounds named political personalities and portfolio titles far more clearly than committees, policy boards, review panels or published procedural rules for policy formation.

That may simply reflect communications strategy rather than the absence of internal machinery.

Nevertheless, for a party claiming it is preparing to govern, institutional readiness should be demonstrable without requiring the public to infer the process from individual appointments.

A mature policy operation should be capable of answering a simple question: who is accountable for the evidence, legality, costing and deliverability of this proposal before the leader announces it?

12. Policy Authority and Political Authority May Not Be the Same Thing

Orr may lead policy development, but Farage remains party leader and the dominant political authority.

Kruger may design government machinery, but shadow spokespeople publicly announce proposals in their own portfolios.

External advisers may contribute technical ideas, while the Party Board and constitution create separate formal governance structures.

Part VII must therefore avoid assuming that the person with the grandest title wrote the policy. Authorship, advocacy, approval and implementation are different functions and need to be traced separately.

Stage in a mature policy process	Evidence that would strengthen public assurance	Why it matters
Origination	Named author/adviser; problem statement; evidence base	Separates political slogan from policy proposal
Challenge	Internal dissent/review; alternative options considered	Tests groupthink and robustness
Fiscal review	Cost model; assumptions; sensitivity analysis	Tests affordability and hidden liabilities
Legal review	Compatibility analysis; required primary/secondary legislation	Tests whether announcement can lawfully be implemented
Operational review	Departmental capacity; workforce; procurement; timeline	Tests delivery
Conflict review	Adviser/donor interests and declarations	Tests integrity of process
Approval	Board/leader/policy committee sign-off record	Establishes accountability
Publication	Versioned policy paper and underlying assumptions	Allows external scrutiny
Revision	Mechanism for correcting policy when evidence changes	Tests whether process learns

13. “Most Prepared Incoming Government” Is Now an Auditable Claim

Reform has repeatedly framed its preparations as evidence that it will not repeat the experience of insurgent movements that reach office without sufficient administrative planning.

Yusuf’s claim that Reform would be the “most prepared incoming government” should therefore be treated as an empirical proposition, not campaign rhetoric that escapes scrutiny.

Preparation can be tested through draft legislation, costings, implementation plans, named expertise, legal opinions, transition plans and evidence of internal challenge.

Part VII will use those outputs, where available, as the standard against which Reform's claim is assessed.

14. The Critical Difference Between Expertise and Ideological Alignment

Every political party recruits advisers who broadly share its objectives. Policy development cannot operate if every participant rejects the political mandate.

But implementation failure often occurs because institutions fail to distinguish loyalty to an objective from willingness to challenge the method proposed to achieve it.

Reform's external networks include people explicitly supportive of its mission. That may increase speed and ideological coherence.

The governance test is whether its system also contains credible "red teams": people empowered to say that a popular proposal is unaffordable, unlawful, internally contradictory or operationally impossible.

15. This Connects Directly to the Findings in Part V

The mass-removal investigation in Part V found that political intent is only the first step in a chain involving law, detention capacity, diplomatic agreements, transport, workforce, courts, procurement and enormous financial commitments.

If Reform's policy machinery had already stress-tested those constraints before announcing the programme, there should be documentary evidence of that work.

If the detailed implementation architecture appeared only after public challenge, that would indicate a different policy-development model: announcement first, engineering later.

Part VII can therefore use selected policies already audited elsewhere as case studies of the process rather than repeating their substantive feasibility analysis.

16. Provisional 7.1 Assessment

SECTION 7.1 VERDICT

Reform UK in 2026 has a recognisable and expanding policy apparatus. It is no longer accurate to describe the party simply as a leader plus slogans with no policy operation.

The public record identifies James Orr as Head of Policy, Danny Kruger leading Preparing for Government, portfolio spokespeople styled as a shadow team, external specialist networks and claims that substantial draft legislation is being prepared.

What remains unclear is the GOVERNANCE OF THAT APPARATUS: the formal chain of policy authority, the independence of legal and fiscal challenge, the role of the Party Board and members, the relationship between external ideological allies and internal staff, and the documentary standards applied before announcements become official policy.

The current evidence therefore supports:

POLICY CAPACITY IS BEING BUILT + NAMED CENTRAL FIGURES EXIST + EXTERNAL EXPERT NETWORKS EXIST + IMPLEMENTATION PREPARATION IS PUBLICLY CLAIMED — BUT THE POLICY SIGN-OFF, CHALLENGE AND ASSURANCE PROCESS IS NOT YET PUBLICLY DEMONSTRATED.

17. What 7.1 Does Not Establish

- That James Orr personally writes every Reform policy.
- That Nigel Farage ignores the policy team.
- That Reform has no legal or economic review process.
- That external think tanks or donors secretly control policy.
- That a non-MP cannot legitimately hold an internal party spokesperson or shadow title.
- That supportive lawyers or advisers are incapable of providing rigorous advice.
- That Reform’s claim to have draft legislation prepared is false.

Policy Formation: The Machinery Behind Reform’s Programme

7.2 The Policy-Making Chain: Orr, Kruger, Farage, the Party Board and the External Network

THE CENTRAL FINDING

Reform's constitution answers one part of the question more clearly than its public presentation does: the Party Leader has explicit constitutional power to "make or approve national statements of the Party's policies and the manner of their communication". The Leader may also create advisory groups and make other appointments.

That means James Orr may run policy development and Danny Kruger may run preparation for government, but the constitution places the decisive public-policy authority with Nigel Farage as Leader. The unresolved question is how much structured challenge occurs before that authority is exercised.

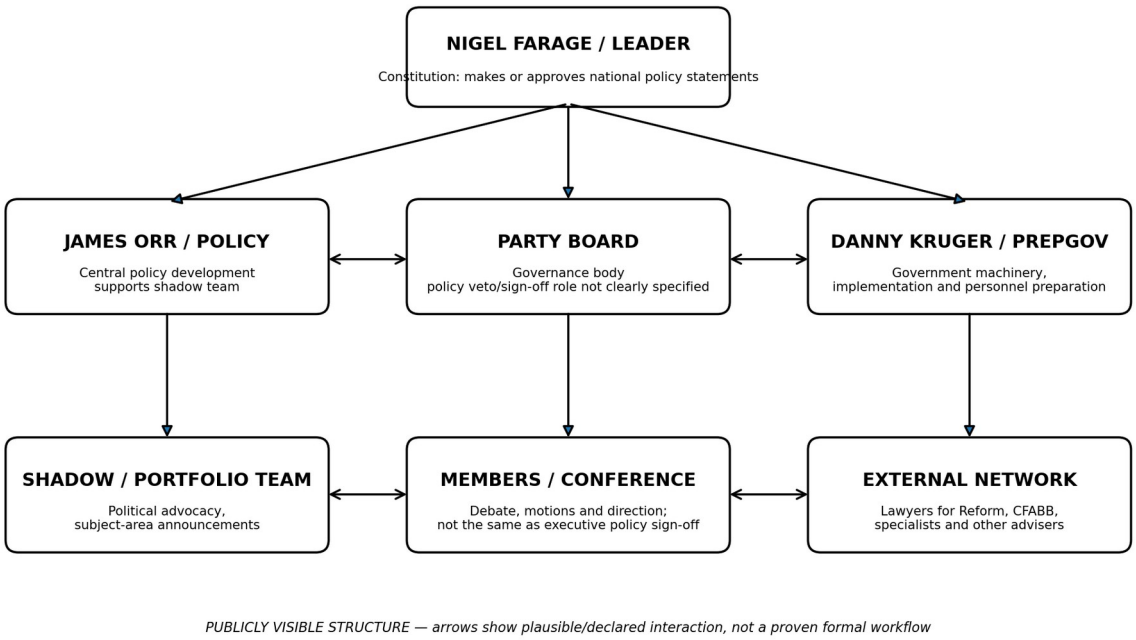

NIGEL FARAGE / LEADER
Constitution: makes or approves national policy statements
JAMES ORR / POLICY
Central policy development
supports shadow team
PARTY BOARD
Governance body
policy veto/sign-off role not clearly specified
DANNY KRUGER / PREPGOV
Government machinery,
implementation and personnel preparation
SHADOW / PORTFOLIO TEAM
Political advocacy,
subject-area announcements
MEMBERS / CONFERENCE
Debate, motions and direction;
not the same as executive policy sign-off
EXTERNAL NETWORK
Lawyers for Reform, CFABB,
specialists and other advisers
PUBLICLY VISIBLE STRUCTURE — arrows show plausible/declared interaction, not a proven formal workflow

Figure 7.2A — Reform UK's emerging policy ecosystem. This is an analytical map of publicly evidenced roles, not a claim that every arrow represents a formal reporting line.

1. The Constitution Puts the Leader at the Top of National Policy Communication

Reform's current constitution gives the Party Leader unusually explicit authority over national policy statements. Clause 7.3.3 says the Leader "shall make or approve national statements of the Party's policies and the manner of their communication".

Clause 7.2 separately allows the Leader, at his discretion, to form advisory groups on any matter relevant to his functions, with the Board informed of their membership.

Clause 7.3.4 permits the Leader to make other appointments as he thinks fit, subject to informing the Board at its next meeting.

Those provisions do not prove that Farage personally originates every policy. They do establish that the formal constitutional architecture gives him a direct approval route over what becomes a national statement of Reform policy.

THIS CHANGES THE 7.1 QUESTION

The public-facing job title "Head of Policy" does not displace the Leader's constitutional authority. A more accurate model is:

POLICY DEVELOPMENT → INTERNAL/EXTERNAL INPUT → LEADER MAKES OR APPROVES NATIONAL POLICY STATEMENT.

The missing part is the assurance layer between development and approval.

2. The Party Board Governs the Party — But the Constitution Does Not Give It an Equivalent Policy-Approval Clause

The constitution establishes the Party Board as a central governance body and gives it extensive organisational responsibilities.

The Leader is entitled to sit on Board subcommittees and working groups, and some senior appointments require Board approval.

However, the explicit clause concerning national statements of party policy is located in the Leader's powers rather than framed as a Board vote or mandatory policy-committee approval.

That does not mean the Board never discusses or influences policy. It means the public constitutional document does not appear to make collective Board approval a necessary precondition for every national policy announcement.

3. Members Have Greater Rights Than Under the Old Company Structure — But Not a General Policy Veto

The 2024 constitutional reform was significant. Reform moved away from its shareholder-controlled structure and promised branch organisation, member participation and rights to debate issues and the direction of the party.

That is a genuine democratisation compared with the earlier model.

But member participation should not be confused with a requirement that every national policy be approved by the membership before the Leader announces it.

The evidence currently supports a hybrid structure: greater grassroots participation below, while substantial national-policy authority remains concentrated at leadership level.

4. Orr's Role Looks Like Policy Production Rather Than Ultimate Constitutional Authority

Reform's website identifies James Orr as Head of Policy, and his appointment was presented as building a serious policy operation to support the shadow team.

That makes Orr the clearest identifiable manager of policy production.

But the constitution means his practical power must be distinguished from final constitutional authority. He can coordinate evidence, advisers, drafts and portfolio work while the Leader retains the power to make or approve the national statement.

The important research question is therefore not "Is Orr really in charge?" but "What must an Orr-led proposal pass through before Farage approves it?"

5. Kruger Runs a Parallel Implementation Machine

Danny Kruger's Preparing for Government operation has its own website, publications and recruitment mechanism for outside expertise.

Its published work goes well beyond campaign messaging. It proposes abolition of the Cabinet Office and Cabinet Secretary role, a new Office of the Prime Minister, a Department of the Civil Service, ministerial hiring-and-firing powers and large changes to quangos and Whitehall.

Kruger has explicitly said Reform intends to prepare openly, identify people for key appointments and arrive on Day One with a plan.

This makes PrepGov partly an implementation unit and partly a policy-producing institution in its own right.

6. Orr and Kruger Therefore Occupy Different but Overlapping Lanes

Question	Orr / Policy	Kruger / PrepGov	Potential overlap
What should Reform promise?	Central policy development	May generate machinery-of-state proposals	High
How should a policy be expressed?	Supports shadow team / policy documents	Publishes implementation blueprints	Medium
How would government execute it?	Should inform feasibility	Core PrepGov mission	High
Who should staff government?	Not publicly central to Orr remit	PrepGov explicitly seeks expertise/people	Low-medium

Question	Orr / Policy	Kruger / PrepGov	Potential overlap
Who drafts legislation?	Likely policy/legal interface, details unclear	PrepGov claims readiness and structural reform	High
Who finally approves national policy?	No equivalent constitutional clause identified	No equivalent constitutional clause identified	Leader has explicit clause 7.3.3 authority

7. PrepGov Is Actively Recruiting Expertise Outside the Parliamentary Party

Preparing for Government openly invites people with skills and experience to submit their details and separately solicits information from serving civil servants through an anonymous survey.

This is potentially sensible preparation for a party with limited Westminster depth. The Institute for Government has repeatedly stressed that detailed pre-election preparation matters because UK governments can transition into office almost overnight.

It also means Reform's prospective governing apparatus is being assembled partly outside the elected parliamentary party.

That makes transparency about who is advising, on what terms, and with what conflicts increasingly important as proposals become more detailed.

8. Reform's Preparation Model Is Explicitly Designed to Reduce Dependence on Existing Whitehall Advice

Kruger's published programme is not simply about preparing ministers to work with the existing civil service. It proposes changing the relationship between ministers and officials.

His October 2025 paper says Reform wants more expertise, advice and executive capability brought into Whitehall from outside government.

The May 2026 "Fixing the Centre" paper goes further, proposing ministerial powers to hire and fire officials and recruit private-sector talent.

That makes Reform's pre-government adviser network unusually consequential: some of the people helping formulate policy before an election could potentially become part of the machinery intended to implement it afterward.

A GOVERNANCE ISSUE, NOT AN ACCUSATION

Recruiting outside expertise is not improper; governments routinely use special advisers, experts and external appointments.

The governance issue is that Reform proposes to expand political control over appointments while simultaneously building a pre-government network of aligned external expertise. The stronger that model becomes, the more important disclosure, conflict management and transparent selection criteria become.

9. Lawyers for Reform Is Formally Closer to the Party Than a Generic Friendly Think Tank

Lawyers for Reform describes itself as a special-interest group within Reform UK and says one of its aims is to contribute to the legal underpinning of the party's policies.

Its launch involved Danny Kruger in his Preparing for Government role and Richard Tice.

That gives Reform an identifiable pool of politically supportive legal expertise.

But it also sharpens the assurance question: legal assistance aimed at helping implement Reform's mission is not necessarily the same function as independent legal challenge tasked with identifying fatal flaws in a proposal.

10. The Centre for a Better Britain Sits Further Outside — but Its Ambition Overlaps Heavily

The Centre for a Better Britain describes itself as an independent think tank seeking to develop policy and constitutional reform in preparation for Britain's future leaders.

It says its work can include peer review, modelling, scenario planning, private commissioned work and collaboration with aligned partners.

Its stated scope includes preparing ideas for the next government in 2029 and helping future leaders and special advisers be ready to govern from Day One.

Those aims substantially overlap with Reform's own PrepGov language even though the Centre is a separate organisation. That makes personnel, commissioning and idea-transfer links legitimate subjects for investigation.

11. The James Orr Link Is Particularly Important

Before becoming Reform's Head of Policy, Orr was publicly associated with the Centre for a Better Britain and its policy-development work.

His move into Reform therefore illustrates how the boundary between external intellectual network and internal party machinery can be porous.

That is not inherently problematic; political parties routinely recruit from think tanks.

For evidential purposes, however, it means policy authorship cannot always be inferred from the organisation that first published or discussed an idea. Personnel can carry ideas, drafts and networks across institutional boundaries.

12. The Leader Can Create Advisory Groups Without a Constitutionally Specified Independent Appointment Process

Clause 7.2 gives the Leader discretion to form advisory groups and requires him to inform the Board of their membership.

The clause does not, on its face, specify an open appointment process, conflict test, publication requirement or member approval.

That flexibility can be useful for rapid expert recruitment.

It also means the quality of the advisory system depends heavily on choices made by the Leader and whatever internal controls the party applies beyond the constitutional minimum.

13. The Policy Pipeline We Can Actually Evidence

Stage	What is publicly evidenced	Confidence
Ideas / inputs	Shadow figures, specialist advisers, PrepGov, Lawyers for Reform, external think-tank ecosystem	HIGH
Central policy coordination	James Orr identified as Head of Policy	HIGH
Government-delivery planning	Danny Kruger / Preparing for Government	HIGH
Member debate / direction	Constitutional reforms and branch/member participation	HIGH
Board governance	Party Board exists with formal governance powers	HIGH
National policy statement approval	Leader expressly makes or approves national policy statements	VERY HIGH
Mandatory independent fiscal challenge	No consistent public process identified in research to date	UNRESOLVED
Mandatory independent legal challenge	Supportive legal network identified; independent assurance process unresolved	UNRESOLVED

Stage	What is publicly evidenced	Confidence
Published conflict-of-interest review for policy advisers	No general system identified in research to date	UNRESOLVED
Versioned audit trail from draft to approved policy	Not publicly demonstrated as a general process	UNRESOLVED

14. What the Institute for Government Benchmark Adds

The Institute for Government's work on preparing oppositions for power emphasises that detailed preparation is genuinely important in the UK because transitions can happen extremely quickly.

That supports Reform's decision to start PrepGov years before an election rather than treating the exercise itself as unusual.

But preparation for government is not synonymous with centralising political control. Effective transition also requires clarity over priorities, implementation sequencing, personnel, relations with the civil service and realistic understanding of institutional constraints.

The appropriate benchmark for Reform is therefore not whether it is preparing, but whether the preparation produces robust, implementable decisions.

15. The Model Appears to Prioritise Political Mandate Over Institutional Friction

Kruger's own published papers repeatedly frame existing institutions as potential blockers of an elected Reform mandate.

His proposals seek to strengthen ministers against the civil service, quangos, international legal constraints and other institutional checks.

That philosophy is relevant to policy formation because it may shape what Reform counts as a problem to be solved: an external warning can be treated either as evidence that a proposal needs revision or as resistance that a future government must overcome.

Part VII should therefore test whether internal policy challenge is genuinely adversarial enough to compensate for a governing philosophy that is explicitly sceptical of external institutional constraint.

16. A Strong Policy Machine Needs Someone Whose Job Is to Say "No"

Political leadership naturally asks how an objective can be achieved.

Policy assurance must also ask whether it should be attempted in the proposed form, what it costs, what it displaces, what law prevents it and what unintended consequences follow.

The public Reform structure now gives us names for leadership, policy development, government preparation and supportive legal expertise.

We have not yet identified an equally visible institutional function whose defining purpose is independent challenge rather than delivery of the political mission.

THE MISSING BOX IN THE DIAGRAM

The most important absence is not another spokesperson. It is an identifiable ASSURANCE / RED-TEAM FUNCTION between policy development and leader approval.

That function could exist internally and simply not be public. Part VII should now look for evidence of it: economists empowered to reject costings, lawyers empowered to stop unlawful proposals, implementation specialists empowered to challenge timelines, and conflict reviewers independent of the policy sponsor.

17. The Farage Factor Is Now Constitutionally Grounded Rather Than Merely Personal

Earlier parts of this report have examined Farage's political dominance as a matter of organisational history and leadership culture.

Section 7.2 adds a harder documentary point: the constitution itself gives the Leader explicit authority over national policy statements.

That means concentration at the top is not merely an inference from Farage's media profile.

The proper question is whether the surrounding policy apparatus meaningfully constrains, informs and documents that authority before it becomes public policy.

18. Provisional Policy-Machinery Assessment

SECTION 7.2 VERDICT

Reform's emerging policy machinery is more substantial than its parliamentary size suggests. It now combines an internal Head of Policy, a Preparing for Government operation, portfolio spokespeople, member/branch structures, supportive legal specialists and an external think-tank ecosystem.

But the formal constitutional endpoint remains unusually clear: the PARTY LEADER makes or approves national statements of party policy.

The evidence therefore supports:

DISTRIBUTED POLICY INPUT + EXPANDING EXPERT NETWORK + SEPARATE IMPLEMENTATION PREPARATION + FORMAL MEMBER PARTICIPATION — BUT CONCENTRATED NATIONAL POLICY APPROVAL AND NO PUBLICLY DEMONSTRATED MANDATORY INDEPENDENT ASSURANCE GATE.

That is not proof of bad policy-making. It is the institutional question Part VII now needs to test against actual policy case studies.

19. What 7.2 Does Not Establish

- That the Party Board has no practical influence over policy.
- That members have no influence over Reform's political direction.
- That Farage personally drafts policy documents.
- That Orr or Kruger lack autonomy in their respective roles.
- That Lawyers for Reform provides poor legal advice.
- That Centre for a Better Britain is controlled by Reform.
- That external advisers are promised government jobs.
- That Reform has no internal red-team or assurance process simply because one is not publicly visible.

Policy Formation: The Machinery Behind Reform's Programme

7.3 Policy Case Studies: Announcement First or Assurance First?

THE TEST

Sections 7.1 and 7.2 mapped Reform's expanding policy machinery. Section 7.3 asks whether that machinery leaves a visible evidential trail BEFORE major promises are announced.

Three case studies are used because they test different functions: fiscal assurance, tax-policy design and operational/legal assurance. The standard is deliberately fair: absence of published workings does not prove that no internal work occurred. It does, however, limit the extent to which claims of exceptional readiness can be independently verified.

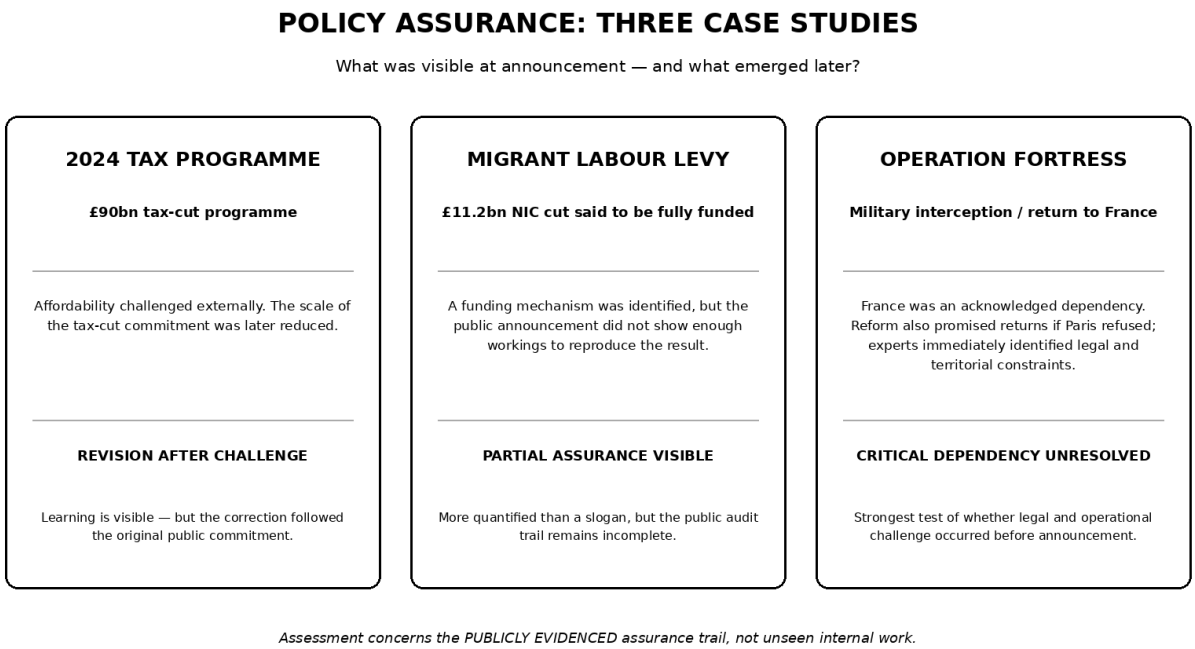

POLICY ASSURANCE: THREE CASE STUDIES
What was visible at announcement — and what emerged later?
2024 TAX PROGRAMME
£90bn tax-cut programme
Affordability challenged externally. The scale of the tax-cut commitment was later reduced.
REVISION AFTER CHALLENGE
Learning is visible — but the correction followed the original public commitment.
MIGRANT LABOUR LEVY
£11.2bn NIC cut said to be fully funded
A funding mechanism was identified, but the public announcement did not show enough workings to reproduce the result.
PARTIAL ASSURANCE VISIBLE
More quantified than a slogan, but the public audit trail remains incomplete.
OPERATION FORTRESS
Military interception / return to France
France was an acknowledged dependency. Reform also promised returns if Paris refused; experts immediately identified legal and territorial constraints.
CRITICAL DEPENDENCY UNRESOLVED
Strongest test of whether legal and operational challenge occurred before announcement.
Assessment concerns the PUBLICLY EVIDENCED assurance trail, not unseen internal work.

Figure 7.3A — Publicly visible policy-assurance trail across three Reform policy case studies.

1. Why These Three Cases?

The purpose is not to re-litigate the substantive merits of policies already examined elsewhere in this report.

Instead, each case is reconstructed around a narrower process question: what evidence of costing, legal review, operational testing or revision was visible when the policy became a public commitment?

The cases deliberately include one example where Reform later changed course. A credible policy system should be able to revise itself when assumptions no longer survive scrutiny.

The question is therefore not whether Reform ever changes policy. It is whether robust challenge is occurring early enough to shape the promise before the political commitment hardens.

CASE STUDY A — The 2024 Tax Programme and the 2025 Fiscal Reset

2. Reform Published an Exceptionally Large Tax-Cut Programme in 2024

Reform's 2024 election programme proposed roughly £90 billion of tax cuts. Measures included raising the income-tax personal allowance to £20,000, reducing corporation tax toward 15 per cent, increasing inheritance-tax thresholds and a series of other reliefs.

Professional tax and fiscal commentators questioned whether the package's savings and revenue assumptions were sufficient to fund commitments on that scale.

The Chartered Institute of Taxation also sought clarification from parties during the election campaign on tax administration and simplification. Its published election challenge records that Reform had not replied by the time of its final update.

The significance for Part VII is procedural: a large, quantified programme reached publication while major external questions remained about how its fiscal arithmetic would work.

3. By November 2025 Farage Had Publicly Abandoned the Commitment to Cuts on That Scale

In November 2025, Farage said Reform was no longer committed to the £90 billion tax-cut programme and acknowledged that substantial cuts on that scale were not realistic given the public finances.

He described the change as a more mature approach and said Reform should not over-promise.

This is evidence of policy learning rather than evidence of an organisation incapable of changing its mind.

But it also creates an obvious assurance question: if the fiscal constraint was serious enough to require abandonment in 2025, what process had allowed the original package to become an election commitment in 2024?

CASE A ASSESSMENT

POSITIVE FINDING: Reform did revise a major programme when it concluded the fiscal environment did not support it.

GOVERNANCE FINDING: the visible correction occurred AFTER the high-value promise had already been published and campaigned on. The case therefore demonstrates revision capacity more clearly than it demonstrates strong pre-announcement assurance.

4. The 2025 Reset Also Shows the External Policy Network Becoming More Formal

The same November 2025 period saw Richard Tice announce working groups on tax, pensions and savings, SME finance, regulation and the Bank of England mandate.

The Chartered Institute of Taxation reported that these groups were to be run by the Centre for a Better Britain and described by Tice as independent of Reform.

That is exactly the sort of external expert infrastructure identified in 7.2.

The chronology is important: the more formal expert-network model appears alongside a retreat from some of the party's earlier, more expansive fiscal promises.

CASE STUDY B — The Employers' Migrant Labour Levy

5. The June 2026 Announcement Was More Quantified Than a Typical Campaign Slogan

In June 2026, Robert Jenrick announced that Reform would cut employer National Insurance Contributions from 15 per cent to 13.8 per cent for British citizens while leaving the higher rate in place for foreign nationals and adding a new Employers' Migrant Labour Levy.

Reform put a headline figure on the tax cut: approximately £11.2 billion.

It also made a clear funding claim: the new Migrant Labour Levy would fully fund the reduction, with additional savings expected if more British citizens moved from Universal Credit into work.

Compared with a bare political promise, that is a meaningful improvement in policy specification because Reform identified both a cost and a claimed funding mechanism.

6. But the Public Announcement Does Not Provide Enough Detail to Reproduce the Funding Claim

The Reform article announcing the policy does not set out, on the page, a levy rate or complete calculation showing how the proposed charge on foreign workers produces the revenue required to cover the stated £11.2 billion cost.

Nor does the announcement publish a sensitivity analysis for behavioural change — for example, how much revenue falls if employers respond exactly as Reform intends and hire fewer foreign workers.

That does not establish that no modelling exists internally.

It does mean the public cannot independently test the claim that the policy is "fully funded" from the announcement material alone.

THE SELF-ERODING TAX-BASE QUESTION

A levy designed to make employers hire fewer foreign workers has a built-in policy tension: if it succeeds strongly in changing employer behaviour, the tax base that is supposed to finance the NIC cut shrinks.

That does not make the policy impossible. It means a robust costing needs behavioural scenarios showing how the permanent tax cut remains financed as levy receipts respond to the policy's own success.

7. This Is Exactly What an Assurance Trail Should Resolve

Assurance question	What Reform published	What remains needed for reproducibility
Gross cost of NIC reduction	About £11.2bn	Underlying workforce/payroll assumptions
Funding source	Employers' Migrant Labour Levy	Levy rate, taxable base, exemptions and collection design
Behavioural response	Policy intends employers to hire more British workers	Revenue sensitivity as foreign-worker employment falls
Welfare interaction	Further savings from moving Britons into work	Caseload, wage and take-up assumptions

Assurance question	What Reform published	What remains needed for reproducibility
Legal/administrative design	Differential treatment described	Detailed legislation and interaction with existing rights/treaties
Net fiscal result	Described as fully funded	Published model showing central and downside scenarios

8. Case B Shows Partial Assurance, Not No Assurance

It would be unfair to classify the Migrant Labour Levy announcement as an uncosted slogan. Reform did publish a cost and a funding proposition.

The stronger criticism is narrower: the published material does not provide the assumptions needed to audit the result.

That distinction matters throughout this report. “Not publicly reproducible” is not the same allegation as “invented”.

For a party claiming exceptional readiness, however, publishing the workings would materially strengthen the credibility of the claim.

CASE STUDY C — Operation Fortress

9. Operation Fortress Was Announced on 3 August 2026 as a Rapid Military Solution to Small-Boat Crossings

Reform announced Operation Fortress as a military-led plan to intercept small boats and return their occupants to France.

Farage said that under a Reform government there would be no more boats within a fortnight.

Reform’s own account said Zia Yusuf would seek an agreement allowing people to be handed to French authorities at a port, but also said that if Paris refused, Royal Marines would return them to the French coast.

That makes French cooperation not a peripheral detail but a central operational and legal dependency.

10. The Dependency Was Identified Publicly Almost Immediately

Reuters reported expert criticism on the day of the announcement that Britain could not simply move warships into French territorial waters, seize boats or disembark passengers in Calais without French permission.

Former military officer Andrew Fox summarised the problem as a gap involving ships, sailors, France and the law.

The point is not that external criticism automatically proves the policy impossible. The point is that the central dependency was obvious enough to be identified immediately from the public proposal.

For Part VII, that creates a direct test of the internal challenge system mapped in 7.2: what did Reform's legal, military, diplomatic and policy advisers conclude about the France-consent problem before the promise was announced?

11. Operation Fortress Is Especially Revealing Because Reform Already Had a Detailed Removal Programme

Operation Fortress did not emerge into an empty policy space. Reform's existing Operation Restoring Justice already proposed a Deportation Command, up to 24,000 secure removal-centre places, return agreements, charter flights and major legal change.

Part V of this report has already examined those removal and detention constraints in detail.

The August 2026 announcement therefore represents an additional front-end interception promise layered onto an already complex removal architecture.

If Reform's policy machinery is now as mature as its leaders claim, Operation Fortress should be an unusually good candidate for documentary evidence of pre-announcement legal and operational stress-testing.

CASE C ASSESSMENT

Operation Fortress currently provides the clearest case-study reason to investigate "announcement first or assurance first".

The public policy statement contains an acknowledged diplomatic dependency — France — while simultaneously promising a unilateral outcome if France refuses. Independent experts immediately identified territorial and legal constraints.

The decisive evidence would be Reform's PRE-ANNOUNCEMENT legal, naval and diplomatic analysis. Without it, the public record shows a highly specific promise but not the assurance trail needed to demonstrate that its central obstacle had been resolved before launch.

12. The Three Cases Show Three Different Levels of Policy Maturity

Case	What was visible at announcement	What happened / remains	Process assessment
2024 tax programme	Large quantified package and claimed savings	Major tax-cut commitment later scaled back as unrealistic in current fiscal conditions	REVISION CAPACITY VISIBLE; PRE-LAUNCH ASSURANCE QUESTION

Case	What was visible at announcement	What happened / remains	Process assessment
Migrant Labour Levy	Headline cost + identified funding mechanism	Detailed public model/behavioural sensitivities not identified in announcement	PARTIAL ASSURANCE; REPRODUCIBILITY GAP
Operation Fortress	Specific operational promise and timetable	Central France/legal dependency immediately disputed	CRITICAL DEPENDENCY NOT PUBLICLY RESOLVED

13. This Is Not a Simple Story of "Policy Made Up on the Spot"

The evidence is more nuanced than that.

Reform has demonstrably become more willing to attach numbers, implementation structures and named policy personnel to its proposals.

It has also shown that it can reverse or modify commitments — the 2025 fiscal reset is an important example.

The concern is consistency. The publicly visible assurance standard varies considerably between policies, and the most politically dramatic announcements can still arrive without the underlying legal, fiscal or operational work being published alongside them.

14. The Timing of Challenge Matters

A mature policy system is not one that never makes mistakes. No government or opposition meets that standard.

The more useful distinction is when the strongest challenge occurs.

If lawyers, economists and operators challenge assumptions before announcement, the public promise should already reflect those constraints.

If the decisive qualifications emerge only after journalists, professional bodies, courts, foreign governments or technical experts respond, the policy system is functioning more as a post-announcement repair mechanism.

THE CORE PART VII TEST

PRE-ANNOUNCEMENT ASSURANCE asks: “What could make this fail, and have we solved it?”

POST-ANNOUNCEMENT ENGINEERING asks: “We have promised this. How can we now make it work?”

Both involve policy expertise. They are not the same model of government preparation.

15. Reform’s 2025–26 Evolution May Itself Be the Important Finding

The chronology suggests Reform is not static. Its policy operation has become more formal, its economic rhetoric more fiscally cautious, and its external expert networks more visible.

That makes it possible that the party is actively correcting weaknesses exposed by its earlier programme.

But a developing institution should be judged by its current outputs. The existence of James Orr, PrepGov and expert networks raises rather than lowers the evidential standard for new flagship announcements.

By 2026, “we are still building the policy machine” is less compatible with simultaneous claims to be the most prepared incoming government.

16. What Evidence Would Change This Assessment?

- Publication of pre-announcement legal opinions or legal issue matrices for Operation Fortress.
- A detailed Migrant Labour Levy costing model including rate, tax base, exemptions and behavioural sensitivities.
- Minutes or records showing policy proposals being materially changed or rejected through internal challenge before public announcement.
- Named independent economists, lawyers or operational specialists with a formal assurance role rather than an advocacy role.
- Version histories demonstrating that detailed implementation work preceded, rather than followed, headline commitments.
- Publication of the draft primary legislation Reform says it is preparing, with explanatory notes and cost/impact material.

17. Provisional 7.3 Assessment

SECTION 7.3 VERDICT

The case studies do not support the crude claim that Reform has no policy process. They show a party whose policy machinery is becoming more sophisticated and which is capable of revising major commitments.

But they also reveal an uneven PUBLIC assurance trail.

The 2024 tax programme demonstrates correction after fiscal reality was reassessed. The 2026 Migrant Labour Levy demonstrates greater quantification but not yet public reproducibility. Operation Fortress demonstrates the sharpest concern: a dramatic and time-specific operational promise whose central international/legal dependency was immediately apparent but not publicly resolved at launch.

The evidence therefore supports:

POLICY PROFESSIONALISATION IS REAL + REVISION CAPACITY EXISTS + SOME COSTING IS NOW PUBLISHED — BUT PRE-ANNOUNCEMENT ASSURANCE REMAINS UNEVEN, AND IN AT LEAST ONE FLAGSHIP CASE THE PUBLIC PROMISE APPEARS TO RUN AHEAD OF THE PUBLISHED SOLUTION TO ITS CENTRAL CONSTRAINT.

18. What 7.3 Does Not Establish

- That Reform performs no internal costing.
- That every 2024 tax proposal was inherently unaffordable in every possible fiscal scenario.
- That the Migrant Labour Levy cannot raise substantial revenue.
- That Operation Fortress could never operate under any negotiated agreement with France.
- That policy revision is evidence of incompetence; revision can be evidence of learning.
- That external criticism is automatically correct.
- That unpublished internal analysis does not exist.

Policy Formation: The Machinery Behind Reform’s Programme

7.4 The “Thousands of Pages” Test: Where Is the Draft Legislation?

THE CLAIM IS SPECIFIC ENOUGH TO TEST

On 30 June 2026 Reform UK published Zia Yusuf’s claim that a Reform government would arrive as the “most prepared incoming government”, with “thousands of pages of primary legislation ready to go in that first year”.

That is not merely a promise to legislate. It is a claim about work product. Section 7.4 therefore asks what documentary evidence of that work product is publicly identifiable.

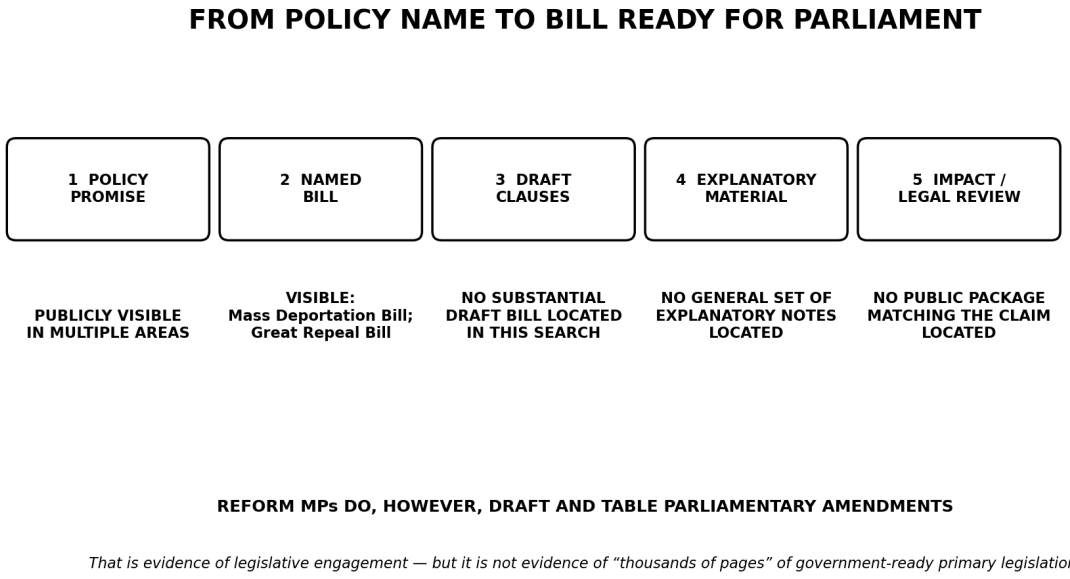

FROM POLICY NAME TO BILL READY FOR PARLIAMENT
1 POLICY PROMISE
2 NAMED BILL
3 DRAFT CLAUSES
4 EXPLANATORY MATERIAL
5 IMPACT / LEGAL REVIEW
PUBLICLY VISIBLE IN MULTIPLE AREAS
VISIBLE: Mass Deportation Bill; Great Repeal Bill
NO SUBSTANTIAL DRAFT BILL LOCATED IN THIS SEARCH
NO GENERAL SET OF EXPLANATORY NOTES LOCATED
NO PUBLIC PACKAGE MATCHING THE CLAIM LOCATED
REFORM MPs DO, HOWEVER, DRAFT AND TABLE PARLIAMENTARY AMENDMENTS
That is evidence of legislative engagement — but it is not evidence of “thousands of pages” of government-ready primary legislation.

Figure 7.4A — Evidential ladder for a claim of government-ready primary legislation. The assessment records material located in the public search; it does not assert that unpublished drafts do not exist.

1. “Primary Legislation Ready to Go” Has a More Demanding Meaning Than a Policy Document

The Cabinet Office Guide to Making Legislation distinguishes political policy from the detailed work required to prepare a government bill.

Government bills are normally drafted by the Office of the Parliamentary Counsel on instructions supplied by departments. Those instructions must translate policy into sufficiently precise legal requirements for specialist legislative drafters.

Bill preparation also involves issues such as delegated powers, territorial extent, commencement, financial implications, parliamentary handling and explanatory material.

An opposition cannot reproduce the full machinery of government before taking office. But if it claims to possess thousands of pages of primary legislation “ready to go”, the natural evidential benchmark is substantially higher than a list of policies or proposed Bill titles.

That benchmark is reinforced by a Cabinet Office answer in April 2026: government Bill preparation draws on legal and policy officials, the Office of the Parliamentary Counsel and a dedicated Bill manager, with the resource required varying according to the size and complexity of the measure. This does not mean an opposition must possess the same machinery. It does mean that "ready to go" legislation is reasonably tested against evidence of organised drafting capacity, not page count alone.

2. Reform Has Named Bills

Reform's current policy portal explicitly says it will pass an "Illegal Migration (Mass Deportation) Bill" as part of Operation Restoring Justice.

Richard Tice has separately promised a "Great Repeal Bill" intended to remove or reverse a wide range of Labour-era rules, including employment-rights, rental and net-zero measures.

Those are genuine legislative commitments and provide identifiable headings around which draft legislation could be organised.

But a named Bill is evidence of legislative intention, not evidence that a parliamentary-ready draft exists.

Publicly identified legislative vehicle	Stated purpose	What was located publicly in this research
Illegal Migration (Mass Deportation) Bill	Detention/deportation architecture; asylum ineligibility and related legal change	Named repeatedly in Reform policy material; no substantial draft Bill text located
Great Repeal Bill	Reverse employment, rental, net-zero/ZEV and other regulatory measures	Public political commitment; no consolidated draft Bill located
British Bill of Rights / Human Rights replacement	Replace Human Rights Act framework after ECHR withdrawal	Policy concept reported/advocated; no complete Reform draft located in this search
Other first-year measures	Borders, justice, institutional change	Numerous promises and policy documents; no public corpus approaching the claimed scale identified

3. Reform MPs Are Demonstrably Capable of Drafting Parliamentary Amendments

The public parliamentary record does contain concrete legislative text associated with Reform MPs.

During proceedings on the Sentencing Act 2026, Nigel Farage and other Reform MPs sponsored amendments deleting clauses and proposing new clauses, including a new clause abolishing the Sentencing Council of England and Wales.

This matters because it prevents an unfair conclusion that Reform has produced no legislative drafting at all.

But amendments to a government bill are categorically different from possessing a complete first-year programme of government bills. They demonstrate parliamentary legislative engagement, not the scale of preparation Yusuf described.

IMPORTANT DISTINCTION

FOUND: real parliamentary amendments sponsored by Reform MPs.

ALSO FOUND: named future Bills and extensive policy commitments.

NOT LOCATED IN THIS PUBLIC SEARCH: a substantial corpus of complete Reform draft Bills, explanatory notes, impact material or other documentary output that independently demonstrates “thousands of pages of primary legislation” ready for a first year in government.

4. A Search for the Claimed Corpus Produces a Striking Evidential Gap

Searches conducted for this section, updated to 11 August 2026, covered Reform’s policy site, Preparing for Government, Lawyers for Reform, the Centre for a Better Britain, parliamentary material and broader reporting. They locate extensive discussion of what Reform intends to legislate for.

They also locate detailed policy papers and government-reform proposals.

What they do not publicly expose is the thing Yusuf’s wording most naturally invites an outsider to look for: a substantial corpus of draft clauses organised into Bills, or an independently verifiable schedule showing that such a corpus exists at the claimed scale.

That is an evidential gap, not proof that the drafts do not exist. A political party may have strong reasons not to publish draft legislation years before an election.

5. Secrecy Would Be a Plausible Explanation — But It Weakens the Publicly Auditable Readiness Claim

Reform could reasonably argue that publishing every draft clause years before an election would reveal strategy, invite premature litigation-style criticism and force constant redrafting as the statute book changes.

Opposition parties also lack access to government departments and the Office of the Parliamentary Counsel in the way an incumbent government does.

Those are important qualifications.

But they create a trade-off: Reform is entitled to keep preparatory legislation private, while outside observers are equally entitled to say that the strongest version of its readiness claim cannot then be independently verified.

6. "Thousands of Pages" Could Also Mean Drafting Instructions, Working Papers or Multiple Versions

Yusuf's phrase does not specify that every page is a final-form Bill clause.

The total could include draft instructions, successive versions, schedules, explanatory material or legal working papers.

That would still represent significant preparation, but it would be different from the ordinary reader's likely understanding of "thousands of pages of primary legislation ready to go".

The report should therefore avoid converting Yusuf's wording into a stronger claim than he actually made. The appropriate request is clarification of what the page count includes.

7. The Government Benchmark Shows Why the Supporting Material Matters

The official Guide to Making Legislation describes bill preparation as a project involving departmental bill teams, Parliamentary Counsel, instructions, legal and policy decisions, parliamentary planning and associated documentation.

The significance is not bureaucratic pedantry. Draft clauses can expose questions that a policy announcement conceals: definitions, exceptions, enforcement powers, appeals, transitional arrangements, delegated powers and interactions with existing law.

This is precisely why Part V repeatedly found that seemingly simple political promises generated large implementation trees once translated into law and administration.

For Reform's "ready to go" claim to carry its strongest meaning, the drafts should have progressed far enough to confront those questions.

8. The Mass Deportation Bill Is the Obvious Test Case

Operation Restoring Justice is one of Reform's most developed policies and expressly names the Illegal Migration (Mass Deportation) Bill.

It is also a policy where legislation would need to resolve unusually difficult questions involving asylum eligibility, detention, appeals, human rights, data sharing, removal powers, international obligations and institutional responsibility.

If Reform possesses a mature draft of this Bill, it would be powerful evidence that its policy machine is operating well beyond campaign-level detail.

Conversely, if the "Bill" currently exists mainly as a policy label plus instructions for future drafting, that would materially qualify the claim that legislation is already ready.

9. The Great Repeal Bill Is an Even More Difficult Drafting Exercise Than Its Name Suggests

Tice's proposed Great Repeal Bill bundles together policy areas governed by different statutes, regulatory systems and commencement arrangements.

Repealing employment-rights provisions, rental reforms, net-zero obligations and vehicle mandates cannot necessarily be achieved by one sentence declaring them abolished.

Some provisions may require consequential amendments, transitional protection for accrued rights, replacement regimes or secondary legislation.

A genuine draft Great Repeal Bill would therefore be another valuable indicator of whether the rhetoric has been translated into detailed legal engineering.

10. Lawyers for Reform Makes the Absence of Public Drafts More Interesting — Not More Suspicious

As established in 7.2, Lawyers for Reform explicitly presents part of its mission as contributing to the legal underpinning of Reform policy.

That provides a plausible source of legal expertise for substantial pre-government drafting work.

It would be wrong to infer from that relationship that Lawyers for Reform has drafted particular Bills without evidence.

But its existence makes it entirely credible that significant legal work could be taking place privately — which is precisely why documentary clarification would be valuable.

11. What Would Count as Strong Corroboration?

Evidence	What it would demonstrate	Evidential value
Publication of one complete draft flagship Bill	Policy translated into operative statutory language	VERY HIGH
Extracts / sample clauses with version dates	Real drafting process and chronology	HIGH
Explanatory notes or clause-by-clause commentary	Advanced legislative preparation	HIGH
Named drafting team / counsel with defined remit	Capacity and accountability	MEDIUM-HIGH
Impact / compatibility / delegated-powers material	Assurance beyond drafting alone	VERY HIGH
List of Bills with approximate page counts and status	Corroborates scale without revealing all text	MEDIUM-HIGH
Only speeches naming future Bills	Legislative intention	LOW-MEDIUM

12. Reform Could Corroborate the Claim Without Publishing Its Entire Legislative Programme

This is important because the evidential test does not require Reform to surrender every draft.

It could publish a schedule identifying Bill titles, approximate page counts, drafting stage, responsible policy lead and whether external legal review has occurred.

It could release one representative Bill as proof of concept.

It could allow reputable independent lawyers or journalists to inspect drafts under embargo and confirm their scale without disclosing politically sensitive content.

Any of those steps would substantially increase the evidential weight of the "thousands of pages" claim.

THE FAIR TEST
Absence of publicly visible drafts is not evidence that drafts do not exist. The narrower finding is that Reform has made a highly specific claim about the quantity and readiness of its legislative work; the public record demonstrates legislative ambition, named Bills, policy papers and parliamentary amendments, but does not independently demonstrate the claimed corpus. That claim could be corroborated without publishing every draft.

13. The Parliamentary Amendments Also Reveal Something Positive About the New Frontbench

Reform's 2026 amendments to sentencing legislation show its MPs engaging with clause-level parliamentary work rather than operating solely through media announcements.

Farage, Tice, Lee Anderson, Sarah Pochin and Danny Kruger appear together as sponsors on multiple amendments.

That is relevant to the "government in waiting" question because it demonstrates at least some collective legislative activity among the elected team.

The report should preserve this as counter-evidence against any suggestion that Reform's legislative preparation is entirely performative.

14. But Amendment Drafting Is Not Government-Bill Preparation

An opposition amendment can be extremely short: delete a clause, replace a line, or insert a discrete new provision.

A government bill implementing a complex programme requires the policy to work as a coherent statutory system.

That difference in scale is why the parliamentary amendments cannot be used to verify Yusuf's page-count claim.

They show legislative competence exists somewhere in the network; they do not show how far the first-year legislative programme has progressed.

15. Section 7.4 Assessment

SECTION 7.4 VERDICT

Reform has produced more legislative evidence than a superficial search for published Bills might suggest. Its MPs sponsor real amendments; its policy platform names future Acts and Bills; its external legal network explicitly exists to help underpin policy; and its Preparing for Government operation is serious about early preparation.

However, the specific June 2026 claim goes considerably further: “thousands of pages of primary legislation ready to go in that first year”.

This investigation has NOT located a publicly accessible body of draft primary legislation approaching that description. Nor has it located a public schedule of draft Bills, page counts, explanatory notes or assurance documents sufficient to independently corroborate the scale claimed.

The evidence therefore supports:

LEGISLATIVE INTENT IS CLEAR + REAL PARLIAMENTARY DRAFTING ACTIVITY EXISTS + LEGAL/POLICY CAPACITY IS BEING BUILT — BUT THE CLAIMED “THOUSANDS OF PAGES” CORPUS REMAINS PUBLICLY UNVERIFIED.

16. What 7.4 Does Not Establish

- That Yusuf’s claim is false.
- That no private draft Bills exist.
- That opposition parties should publish all draft legislation years before an election.
- That Reform MPs lack legislative experience or drafting support.
- That named Bills such as the Mass Deportation Bill are merely invented labels.
- That Lawyers for Reform drafted any specific measure.
- That draft legislation prepared outside government could be introduced unchanged after an election.

Policy Formation: The Machinery Behind Reform's Programme

7.5 Who Are the Drafters? Mapping Reform's Legislative-Preparation Network

THE PEOPLE ARE MORE VISIBLE THAN THE WORK PRODUCT

Section 7.4 found credible evidence that Reform has built policy and legal capacity, but not a publicly verifiable corpus matching the claim of "thousands of pages" of primary legislation. Section 7.5 asks the next question: who, on the public record, could plausibly be doing that work?

The answer is more substantial than a simple claim that Reform has no lawyers or policy infrastructure. Reform now has an identifiable internal policy lead, a dedicated preparation-for-government function, a party legal special-interest group and a closely associated policy think tank. What remains much harder to identify is authorship: which person or team is responsible for which Bill, draft clauses or legislative instructions?

1. Reform Has a Clear Internal Policy Lead

Reform's current national website identifies James Orr as Head of Policy. That gives the party a named senior figure with formal responsibility for policy development and provides an obvious institutional point through which legislative preparation could be coordinated.

Orr's role is significant, but the public description does not itself establish that he personally drafts legislation. Policy leadership, legal drafting and parliamentary counsel are different functions. The evidence therefore supports identifying Orr as a policy-system lead, not assigning him authorship of unnamed Bills.

2. Danny Kruger Provides the Preparation-for-Government Layer

Reform describes Danny Kruger as its Head of Preparation for Government. His published work focuses on how a Reform administration would reorganise central government, appoint personnel, recruit expertise and move quickly after taking office.

That role places Kruger close to the translation of political commitments into an executable programme. Again, however, public evidence of programme leadership is not the same as evidence that Kruger has drafted specific legislation himself.

3. Lawyers for Reform Is a Formal Party Structure, Not an External Fan Group

Lawyers for Reform describes itself as a special-interest group within Reform UK. Its stated mission is explicitly to "contribute to building the legal underpinning" of Reform policies. Its membership is open to barristers, solicitors, legal academics, retired judges, law students and others involved in law.

The group publicly names a leadership team including Honorary President David Jones, President Martin Howe KC, vice-presidents Gary Wood and Laura Bailhache, Honorary Secretary Benjamin Wrench and Treasurer Tim Briggs. The existence of named officers and a formal launch at the Law Society in March 2026 makes this a concrete source of legal expertise rather than a vague claim that sympathetic lawyers exist somewhere in the movement.

The critical evidential limitation is attribution. The public material reviewed for this section does not identify Howe, Bailhache, Wood, Wrench, Briggs or Jones as the drafter of a named Reform Bill. Their association supports the proposition that legal capacity exists; it does not prove who wrote what.

4. The Centre for a Better Britain Adds an External Policy-Engineering Layer

The Centre for a Better Britain states that it exists to develop "world-class policy" and says its work will focus on institutions including the civil service and judiciary. It also insists that it is politically independent, even while reporting and personnel links place it close to Reform's preparation-for-government ecosystem.

Reporting by the Sunday Times stated that the Centre intended to spend resources on radical policy development and draft legislation as part of a broader programme designed to prepare a future right-of-centre government. The Financial Times separately reported that the Centre was examining major constitutional and legal changes.

Those reports materially strengthen the proposition that legislative-development work may be occurring outside Reform's formal payroll. But they still do not identify a publicly accessible Bill corpus or allow named authors to be matched reliably to named drafts.

5. The Network Can Be Mapped More Confidently Than Authorship

Figure 7.5A therefore distinguishes institutional capacity from demonstrated authorship. The purpose is to avoid two opposite errors: claiming that no serious preparation structure exists, or assuming that every lawyer and policy adviser in the network is personally writing Reform legislation.

Institution	Named public lead(s)	Publicly stated / reported role	Evidential status
Reform UK	James Orr	Head of Policy	Policy leadership confirmed; Bill authorship not identified
Preparation for Government	Danny Kruger	Programme / institutional preparation	Preparation role confirmed; Bill authorship not identified
Lawyers for Reform	Martin Howe KC + named officers	Legal underpinning of Reform policy	Legal capacity confirmed; specific Bill attribution not identified
Centre for a Better Britain	Jonathan Brown / policy network	Policy development; reported draft-legislation ambitions	External preparation capacity plausible; specific draft authorship not public

Figure 7.5A — Publicly identifiable legislative-preparation network. "Not identified" means no reliable public attribution was located in the research for this section; it does not mean the work was not performed privately.

6. Parliamentary Staff and Amendment Drafting Remain a Separate Unknown

Section 7.4 established that Reform MPs have sponsored real clause-level amendments in Parliament. Those amendments necessarily involve some combination of MPs, parliamentary staff, legal advisers and House drafting processes.

The public amendment record normally identifies sponsors, not the individual who physically prepared the text. It would therefore be unsafe to infer that a sponsoring MP personally drafted a clause, or that Lawyers for Reform supplied it, unless Reform or the individuals involved say so.

This matters because amendment drafting is currently the clearest publicly visible evidence of Reform engaging with statutory language, yet the personnel behind that work remain largely opaque.

7. There Is a Plausible Division of Labour — But It Is an Inference

Taken together, the visible structures suggest a plausible division of labour: party leaders set political priorities; Orr's policy function develops policy; Kruger's preparation function stress-tests government readiness; Lawyers for Reform supplies legal expertise; the Centre for a Better Britain develops external policy research; and parliamentary teams convert some proposals into amendments.

That model is analytically useful, but it must remain labelled as an inference. The public record reviewed here does not disclose a formal workflow showing how an idea passes from political

announcement to drafting instructions, legal challenge, final clauses and approval by the party leadership.

8. This Missing Workflow Is More Important Than a List of Famous Lawyers

For a government-in-waiting, the key accountability question is not simply whether impressive lawyers can be named. It is whether the organisation has a reproducible process for converting policy into law and exposing weak assumptions before announcement.

A mature legislative workflow would normally leave some evidence of ownership, review and status: responsible policy lead; responsible legal lead; drafting stage; constitutional or human-rights review; fiscal and operational dependencies; and approval authority.

None of that needs to reveal confidential advice. Even a high-level register of Bills and responsible teams would make the readiness claim substantially more auditable.

9. The Strongest Public Evidence Currently Concerns Capacity, Not Output

The cumulative evidence supports a narrower but important conclusion. Reform can now point to identifiable people and institutions capable of supporting serious policy and legal preparation. That is a material change from a purely campaign-led organisation.

What the public evidence still does not establish is scale of output, ownership of specific drafts, the internal challenge process applied to them, or whether the resulting text has reached anything resembling government-Bill readiness.

10. Section 7.5 Assessment

A REAL POLICY-AND-LEGAL PREPARATION NETWORK IS NOW PUBLICLY IDENTIFIABLE + NAMED LAWYERS AND POLICY LEADS EXIST + EXTERNAL POLICY-ENGINEERING CAPACITY IS PLAUSIBLE — BUT RESPONSIBILITY FOR SPECIFIC DRAFT BILLS REMAINS LARGELY UNATTRIBUTED, AND THE WORKFLOW FROM POLICY PROMISE TO LEGISLATIVE TEXT IS NOT PUBLICLY AUDITABLE.

11. What 7.5 Does Not Establish

- That James Orr personally drafts Reform legislation.
- That Danny Kruger personally drafts Reform legislation.
- That any named officer of Lawyers for Reform wrote a particular Bill or amendment.
- That the Centre for a Better Britain is formally controlled by Reform UK.
- That parliamentary amendments sponsored by Reform MPs were physically drafted by those MPs.
- That the absence of public attribution means no private drafting team exists.
- That a private opposition drafting network could replicate the Office of the Parliamentary Counsel before entering government.

Policy Formation: The Machinery Behind Reform's Programme

7.6 Can the First-Year Legislative Programme Actually Pass?

THE SECOND TEST: DRAFTING IS NOT DELIVERY

Sections 7.4 and 7.5 tested the claim that Reform is preparing a large body of legislation and mapped the people and organisations that could contribute to that work. Section 7.6 asks a different question. Even if thousands of pages of technically competent draft legislation exist, could a new Reform government realistically convert that material into law during its first year?

The distinction matters. A draft Bill is an input into the legislative process, not its conclusion. Government legislation must secure parliamentary time, survive scrutiny in both Houses, accommodate amendments and implementation work, and ultimately receive Royal Assent.

1. A Government Cannot Simply Deposit "Thousands of Pages" Into Parliament

The Cabinet Office Guide to Making Legislation describes a managed government-wide legislative programme. Departments bid for legislative slots; the Parliamentary Business and Legislation Committee oversees preparation; Bill teams, Parliamentary Counsel and parliamentary business managers coordinate the route from policy to Royal Assent.

This immediately places a practical constraint on any first-year programme. The relevant unit is not the number of pages drafted in advance. It is the number, size, complexity and political difficulty of Bills that Parliament and government can process simultaneously.

2. Reform's Current Platform Implies Several Major Legislative Projects

Reform's published policies already identify changes that would require substantial primary legislation or closely connected statutory programmes. The clearest example is the proposed Illegal Migration (Mass Deportation) Bill, alongside repeal of the Human Rights Act and major changes to immigration, asylum and detention law.

Other programme commitments across taxation, regulation, public administration and institutional reform could also require primary or secondary legislation. The exact first-year Bill list has not been publicly identified in a form that allows the total parliamentary workload to be calculated.

Figure 7.6A — From draft text to enforceable law: the first-year delivery test.

Stage	What readiness can solve	What readiness cannot remove	Public evidence to test
Drafting	Bills can be prepared before an election.	Parliamentary scrutiny and amendment.	Published Bill text and explanatory material.
Programme	Priorities can be sequenced in advance.	Finite parliamentary and ministerial time.	A named first-year Bill schedule.
Commons	A majority can make	Committee scrutiny,	Timetables and programme

	passage easier.	rebellions and political trade-offs.	motions once introduced.
Lords	Legal issues can be anticipated.	Revision, delay and further scrutiny.	Government response to amendments.
Implementation	Operational planning can start early.	Commencement, regulations, staffing, procurement and litigation risk.	Impact assessments and implementation plans.

3. A Commons Majority Would Matter — But It Would Not Make Parliament Frictionless

If Reform won a stable House of Commons majority, it would normally be able to secure government time and win most Commons divisions. That is a major advantage and should not be understated. A serious assessment therefore cannot assume that parliamentary opposition alone would defeat the programme.

But a majority does not eliminate scrutiny. Large or constitutionally significant Bills still pass through Second Reading, detailed committee consideration, Report and Third Reading before moving through the other House. Programme motions can structure Commons time; they do not turn complex legislation into an administrative formality.

4. The House of Lords Creates a Different Kind of Constraint

A government with a Commons majority does not automatically control the House of Lords. The Lords can amend government Bills and require the Commons to reconsider provisions. Constitutional conventions and the Parliament Acts limit the circumstances in which the Lords can ultimately block an elected government's programme, but disagreement can still consume political and parliamentary time.

For a programme involving human-rights law, executive powers, detention, constitutional machinery or major regulatory change, the likelihood of detailed Lords scrutiny would be material. The relevant question is therefore not simply whether Reform could eventually prevail, but how much of an ambitious first-year programme could be processed concurrently.

5. Carry-Over Helps With Workload; It Does Not Make the First-Year Claim Disappear

Government Bills introduced in the Commons can, subject to the rules, be carried from one parliamentary session into the next. The House of Commons Library notes that carry-over exists specifically to reduce fluctuations in legislative workload. Cabinet Office guidance says it helps spread that workload rather than merely extending time for a Bill that is running late.

A carried-over Bill would normally still be expected to complete its parliamentary passage within 12 months of First Reading unless the House agrees an extension. Carry-over therefore provides flexibility, but it also illustrates the underlying point: parliamentary capacity is finite even for a government that has prepared legislation in advance.

6. The Hardest Bills Are Likely to Generate Work Outside the Chamber Too

Passage is only one component of readiness. Major legislation can require delegated legislation, administrative systems, procurement, recruitment, guidance, data infrastructure, international

negotiations and commencement planning. Measures that alter individual rights or executive powers can also generate rapid legal challenge.

For Operation Restoring Justice, for example, legislation would sit alongside the proposed expansion of removal-centre capacity, a Deportation Command, return agreements and a high-volume removals operation. A Bill could receive Royal Assent before all of those operational dependencies were ready. Legislative speed and implementation speed are therefore separate tests.

7. "Thousands of Pages" May Actually Increase the Parliamentary-Capacity Question

The quantity claim cuts both ways. Thousands of pages could demonstrate substantial preparatory effort. But if those pages represent numerous large Bills, the claim also implies an unusually heavy programme of parliamentary scrutiny, ministerial handling, amendment, explanatory material and implementation.

Conversely, if the material consists mainly of drafting instructions, options papers, subordinate legislation or multiple iterations of the same Bills, page count would tell the public much less about how much primary legislation is genuinely ready for introduction.

8. The Missing Document Is Now a Legislative Programme

Sections 7.4 and 7.5 identified the absence of a publicly verifiable corpus and limited attribution of individual Bills. Section 7.6 adds another missing layer: a first-year legislative schedule.

For the readiness claim to become independently testable, Reform could publish a list showing each intended Bill, its purpose, approximate size, responsible policy and legal leads, intended House of introduction, target session, dependencies and expected implementation timetable.

SECTION 7.6 ASSESSMENT

ADVANCE DRAFTING COULD GIVE A NEW GOVERNMENT A REAL HEAD START + A STABLE COMMONS MAJORITY COULD SUPPORT AN AMBITIOUS PROGRAMME — BUT PARLIAMENTARY TIME, TWO-HOUSE SCRUTINY, AMENDMENT, IMPLEMENTATION AND LEGAL/OPERATIONAL DEPENDENCIES CANNOT BE DRAFTED AWAY. WITHOUT A PUBLISHED BILL-BY-BILL FIRST-YEAR SCHEDULE, THE CLAIM THAT THOUSANDS OF PAGES ARE "READY TO GO" DOES NOT YET DEMONSTRATE THAT THE PROGRAMME IS DELIVERABLE WITHIN A YEAR.

9. What 7.6 Does Not Establish

- That a Reform government with a Commons majority would be unable to pass major legislation.
- That the House of Lords could permanently veto an entire manifesto programme.
- That advance legislative drafting has no value; it could materially accelerate introduction.
- That every policy commitment requires a separate Act of Parliament.
- That all first-year legislation must receive Royal Assent within the first parliamentary session.
- That a large legislative programme is unprecedented or inherently unmanageable.

Policy Formation: The Machinery Behind Reform's Programme

7.7 From Legislation to Implementation: Can the State Do What the Bill Says?

THE THIRD TEST: LEGAL AUTHORITY IS NOT OPERATIONAL CAPACITY

A government can change the law faster than it can change the physical and administrative capacity of the state. Sections 7.4–7.6 examined draft legislation, authorship and parliamentary passage. Section 7.7 tests the next link in the chain: whether Reform's most consequential commitments are accompanied by a visible plan for the people, places, systems, contracts, negotiations and management capacity required to make new legal powers work in practice.

This is not a semantic distinction. Cabinet Office guidance itself treats legislation as a resource-intensive delivery process, requiring properly staffed Bill teams and policy/legal capacity. More broadly, implementation research consistently distinguishes announcing or legislating for a policy from building the machinery capable of delivering it.

1. The Implementation Gap Is a Normal Government Problem — Not a Reform-Specific Accusation

Governments of every party encounter a gap between policy intention and delivery. The Institute for Government has repeatedly identified implementation planning, cross-departmental coordination, project management, monitoring and evaluation as separate capabilities that must accompany policy design.

The fair test for Reform is therefore not whether implementation is difficult. It is whether a party claiming exceptional readiness has done unusually visible work to identify and resolve those difficulties before taking office.

2. Reform's Flagship Programme Contains Several Capacity-Intensive Commitments

The clearest example remains immigration and removals. Reform's published programme combines legal change with a proposed Deportation Command, a large expansion of secure removal capacity, high-volume removals, charter operations and return arrangements with other states. Operation Fortress adds maritime interception and a further international dependency involving France.

Each element can be authorised or facilitated by legislation. None is physically created by legislation. Detention places require sites, planning and construction or conversion, procurement, contractors, trained staff, healthcare and security. Removal operations require casework, identity and travel documentation, escorts, transport capacity and receiving-country cooperation. Maritime operations require vessels, crews, rules of engagement, command structures and an agreed lawful destination for those intercepted.

Figure 7.7A — The implementation chain: what an Act can change and what government must still build.

Commitment	Law can provide	Operational capacity still required	Evidence that would demonstrate

			readiness
Mass removals	Powers, procedures and legal framework	Caseworkers, detention, escorts, flights, documents, receiving states	Capacity model, ramp-up timetable, contracts and country agreements
Detention expansion	Statutory powers and funding authority	Sites, construction, staff, healthcare, security and procurement	Named estate plan, delivery milestones and workforce model
Operation Fortress	Domestic powers and command authority	Vessels, crews, operating procedures and French cooperation	Operational concept, legal assessment and diplomatic agreement
State restructuring	Abolition/creation of statutory bodies where legislation is needed	Transfers of staff, functions, data, budgets and systems	Transition plans, costings and accountable owners
Regulatory/tax change	New duties, rates and enforcement powers	HMRC/regulator systems, guidance, compliance and enforcement	Impact assessment, systems plan and implementation timetable

3. Detention Capacity Provides a Concrete Stress Test

A proposal for tens of thousands of secure removal places is particularly useful because capacity is measurable. Parliament can alter detention law, but a detention place only exists when suitable accommodation, staffing, security, healthcare and supporting systems are operational.

This creates a reproducible research question for the report: starting from the existing estate, what sites, procurement routes, construction or conversion programme, staffing pipeline and annual operating budget would be required to reach Reform's stated capacity — and on what timetable? A headline target is not the same thing as an estate-delivery plan.

4. International Cooperation Cannot Be Manufactured by Domestic Statute

The same distinction applies to returns. Westminster can legislate for domestic procedures, but it cannot legislate another sovereign state into accepting a person. Return agreements, identity verification, diplomatic clearances and travel documentation are implementation dependencies outside the direct control of a UK government.

Operation Fortress makes the point especially stark. Domestic legislation could change UK powers and procedures; it could not by itself create French consent to disembark intercepted people in France. That dependency must be solved diplomatically or the operational design must change.

5. Institutional Reform Has Transition Costs of Its Own

Reform's preparation programme also proposes substantial changes to the machinery of government. Abolishing, merging or redesigning institutions can be legislatively straightforward compared with transferring their functions without interrupting public administration.

Implementation can involve staff transfers, new reporting lines, property, contracts, records, data systems, budgets and statutory responsibilities. Research on machinery-of-government changes warns that rushed restructuring can itself impose disruption and cost. The readiness test should therefore look for transition plans, not merely organisational charts.

6. Secondary Legislation and Guidance Create a Second Delivery Queue

Primary legislation frequently establishes a framework whose detailed operation depends on regulations, commencement orders, codes or guidance. Cabinet Office guidance expressly distinguishes the main policy placed in an Act from delegated powers used to give effect to that framework.

A government arriving with primary Bills already drafted could therefore still face a substantial post-Royal-Assent workload. The more radical and wide-ranging the programme, the more important it becomes to know which implementing instruments have also been prepared.

7. Money Is Necessary but Not Sufficient

A programme may be fiscally funded yet operationally undeliverable on the promised timetable. Conversely, administrative capacity may exist but require more expenditure than the political costing assumes. A mature implementation plan therefore connects the financial model to quantities: staff, facilities, cases processed, procurement lead times, systems changes and achievable ramp-up rates.

This is why the report should resist treating a headline saving or allocated budget as evidence that implementation has been solved. The stronger evidence is a costed delivery model showing what must happen, by whom and when.

8. The Most Useful Readiness Evidence Would Be Boring — and That Is the Point

If Reform has carried out the preparation it describes, the strongest evidence may not be another speech or launch document. It would be the less dramatic material normally associated with delivery: implementation schedules, risk registers, impact assessments, workforce models, procurement assumptions, transition plans, dependencies and named accountable owners.

Publication of every internal working document would neither be realistic nor necessarily desirable. But selective publication of the assumptions and milestones behind flagship commitments would allow outsiders to distinguish a developed delivery programme from a collection of legislative intentions.

SECTION 7.7 ASSESSMENT

REFORM HAS IDENTIFIED SOME OF THE MACHINERY ITS PROGRAMME WOULD REQUIRE + ADVANCE LEGISLATIVE AND POLICY PREPARATION COULD REDUCE START-UP TIME — BUT STATUTORY POWER DOES NOT CREATE PHYSICAL CAPACITY, STAFF, SYSTEMS, CONTRACTS OR INTERNATIONAL COOPERATION. THE PUBLICLY VISIBLE TEST OF "READINESS" MUST THEREFORE EXTEND BEYOND DRAFT BILLS TO COSTED IMPLEMENTATION PLANS, TIMETABLES AND DEPENDENCY MANAGEMENT.

9. What 7.7 Does Not Establish

- That Reform could not expand detention or removal capacity.
- That every implementation plan should be published before an election.
- That international agreements cannot be negotiated by a future Reform government.
- That ambitious institutional reform is inherently undesirable.
- That implementation uncertainty proves a policy is impossible.
- That legislation is unimportant; in many areas it is a necessary first step.

PART VII SYNTHESIS: HOW READY IS REFORM TO GOVERN?

Section 7.8 should close Part VII. It should bring together the evidence from policy machinery, assurance, draft legislation, authorship, parliamentary capacity and implementation without opening another major research branch. The objective should be a concise readiness scorecard: what is demonstrated, what is plausible but unpublished, what remains dependent on future negotiation or capacity-building, and what cannot currently be independently verified.

Policy Formation: The Machinery Behind Reform's Programme

7.8 Part VII Synthesis: How Ready Is Reform to Govern?

THE QUESTION IS NO LONGER WHETHER PREPARATION EXISTS

Part VII began with a deliberately narrow question: what can the public record establish about Reform UK's claim that it is preparing seriously for government? The evidence does not support the proposition that there is no preparation. Reform has created a preparation programme, appointed identifiable policy leadership, recruited external expertise, developed proposals for the machinery of government, cultivated legal-policy networks and publicly claimed that substantial legislative drafting is under way.

The harder question is whether the visible preparation is sufficiently complete, tested and integrated to substantiate Reform's stronger claim: that it would enter office exceptionally ready to convert a radical programme into law and functioning government at speed.

1. What Part VII Has Established

The evidence supports six propositions.

- Reform's preparation for government is real and has become more institutionalised.
- Named policy leadership and external specialist networks now exist around the party.
- Some policies are more developed than simple slogans: costs, structures, legislative intentions and operational mechanisms are increasingly specified.
- Reform has demonstrated a capacity to revise policy when political or fiscal assumptions change.
- Real parliamentary drafting activity by Reform MPs is publicly visible.
- The party has begun thinking explicitly about the machinery of government rather than treating implementation solely as a departmental problem after election.

2. What the Public Record Still Does Not Demonstrate

Those findings do not independently verify the strongest readiness claims. The public record examined in Part VII does not presently expose a bill-by-bill corpus corresponding to the claimed "thousands of pages"; clear authorship and quality-assurance trails for most proposed legislation; a complete first-year legislative schedule; reproducible costing and sensitivity work across flagship policies; or integrated implementation plans showing how physical, administrative and diplomatic dependencies would be delivered.

This is an evidence distinction, not an allegation of fabrication. Unpublished work may exist. The point is that the more specific the readiness claim becomes, the more reasonable it is to ask for documentary evidence capable of testing it.

Figure 7.8A — Reform readiness scorecard: demonstrated, developing and unverified.

Readiness dimension	Publicly	Evidence gap	Assessment

	demonstrated		
Preparation structure	Dedicated programme, named leadership and recruitment of expertise	Full internal governance and challenge process	DEMONSTRATED / DEVELOPING
Policy assurance	Some quantified policies and visible revision	Consistent reproducible costing, legal review and stress-testing	UNEVEN
Legislative preparation	Named intended Bills and real clause-level parliamentary drafting	Public corpus matching the “thousands of pages” claim	PARTLY DEMONSTRATED
Drafting network	Named lawyers, policy figures and external organisations	Bill-by-bill authorship, instructions and quality assurance	DEVELOPING / OPAQUE
Parliamentary delivery	Advance preparation could accelerate introduction	Published first-year Bill schedule and prioritisation model	UNVERIFIED
Implementation	Some machinery and operational structures are identified	Costed workforce, estates, systems, procurement and dependency plans	UNVERIFIED / POLICY-SPECIFIC

3. Reform Should Receive Credit for Preparing Earlier Than Many Insurgent Parties

The Institute for Government stresses that transitions of power in the UK occur exceptionally quickly and that opposition preparation matters because incoming ministers can take control of departments almost immediately after an election. Against that benchmark, Reform’s decision to establish a formal preparation programme well before an election is substantively relevant.

It would therefore be misleading to describe the party as doing nothing beyond campaigning. The stronger criticism is that public evidence of preparation is much more developed at the level of organisational intent, policy announcements and institutional redesign than at the level of auditable delivery plans.

4. The Central Weakness Is the Assurance Chain

Across the case studies, the recurring issue is not simply missing detail. It is whether there is a visible chain connecting political objective to evidence, challenge, legal design, costing, legislation, parliamentary strategy and implementation.

The 2024 fiscal programme showed that Reform can revise commitments when conditions or assumptions no longer support them. The Migrant Labour Levy contained more explicit fiscal architecture but lacked enough published assumptions for outsiders to reproduce the funding claim. Operation Fortress presented the sharpest test because a central diplomatic and legal dependency was apparent at announcement.

Taken together, these cases suggest a preparation system that is becoming more professional but whose pre-announcement assurance standard remains inconsistent.

5. “Thousands of Pages” Is Both Reform’s Strongest Readiness Claim and Its Simplest Documentary Test

Zia Yusuf’s June 2026 statement that Reform would enter government with “thousands of pages of primary legislation ready to go in that first year” materially raises the evidential bar. It converts a general assertion of seriousness into a claim about identifiable work product.

Part VII found evidence compatible with substantial preparation: lawyers are organised around Reform, policy specialists are being recruited, parliamentary amendments have been drafted and intended Bills are named. What remains absent from the public evidence examined is the corpus or inventory that would allow the scale, completeness and readiness of the claimed primary legislation to be independently assessed.

That does not disprove the claim. It leaves it unverified.

6. Even Perfect Draft Bills Would Solve Only Part of the Transition Problem

The Institute for Government’s work on transitions emphasises prioritisation, understanding departments, relationships with the civil service and implementation as well as policy preparation. A new government inherits institutions, legal duties, contracts, budgets, personnel and ongoing services; it does not begin with an empty state.

Part VII therefore rejects page count as a sufficient measure of readiness. The meaningful test is whether the political, legal, parliamentary and operational components of the programme have been integrated.

7. The Appropriate Overall Assessment Is Neither “Ready” Nor “Making It Up”

The evidence supports a more discriminating conclusion. Reform has moved beyond the organisational condition normally associated with a protest party. It is investing in policy capacity and government preparation and has produced some increasingly specific proposals.

But the public evidence does not yet justify treating the party’s strongest claims of exceptional government-readiness as independently established. The principal gaps concern assurance, transparency of legislative work product, prioritisation and implementation.

Those gaps matter more, not less, because the programme is radical. The larger the intended change in immigration enforcement, Whitehall structures, regulation, taxation and rights frameworks, the greater the coordination burden on an incoming government.

PART VII OVERALL FINDING

REFORM UK IS DEMONSTRABLY PREPARING FOR GOVERNMENT. ITS POLICY AND LEGAL INFRASTRUCTURE IS MORE DEVELOPED THAN A CHARACTERISATION OF THE PARTY AS PURELY SLOGAN-DRIVEN WOULD SUGGEST. HOWEVER, THE PUBLIC RECORD DOES NOT YET SUBSTANTIATE THE STRONGER CLAIM THAT THE PARTY HAS A FULLY ASSURED, BILL-BY-BILL AND IMPLEMENTATION-READY FIRST-YEAR PROGRAMME. THE EVIDENCE POINTS TO GENUINE PROFESSIONALISATION — BUT ALSO TO A MATERIAL VERIFICATION GAP BETWEEN PREPARATION CLAIMED AND PREPARATION THAT OUTSIDERS CAN CURRENTLY AUDIT.

8. Evidential Classification

- ESTABLISHED: a formal Reform preparation programme exists; named policy leadership exists; external expertise is being recruited; machinery-of-government proposals have been published; some legislative drafting activity is visible.
- SUPPORTED BUT INCOMPLETE: a wider legal and policy drafting network exists and could plausibly support substantial pre-government legislative preparation.
- NOT PUBLICLY VERIFIED: the scale and completeness of the claimed thousands of pages of primary legislation; a comprehensive first-year Bill programme; integrated implementation plans across flagship commitments.
- NOT ESTABLISHED BY THIS REPORT: that the unpublished material does not exist; that Reform could not govern; that its programme would necessarily fail in Parliament or implementation.

9. What Part VII Does Not Establish

- That Reform UK is incapable of governing.
- That its lawyers, advisers or policy staff lack professional competence.
- That unpublished preparation should automatically be made public in full.
- That radical policy change is administratively impossible.
- That every external criticism of Reform policy is correct.
- That preparation can eliminate the uncertainty inherent in taking office.

END OF PART VII

The substantive investigative expansion of the report should stop here unless the final audit identifies a material evidential omission. The next phase is editorial: consolidate duplicated findings, shorten repeated background material, rebuild the opening synthesis around the completed evidence base, standardise figures and tables, audit citations and cross-references, and prepare the manuscript for publication.

> ***SOURCE NOTE — Detailed Part VII source registers and supplementary research notes are available in the Evidence & Sources Compendium. The main report retains the evidence, case studies, readiness tests and §7.8 synthesis.***

Index

Editorial subject index. References are to report sections rather than page numbers, so the index remains stable as pagination changes. Section references are clickable in Word.

Brexit Party / Reform UK transition §2.1, §2.2
Cottrell, Fiona §3.4
Cottrell, George §3.4
Delo, Ben §3.2, §6.7
Electoral Commission §1.4, §3.1, §3.6
Farage, Nigel §3.1, §4.2, §7.1, §7.8
Funding §2.3, §3.1, §3.3, §3.4, §3.5, §3.6
Governance §4.1, §4.2, §4.3, §4.5, §4.7
Harborne, Christopher §3.1, §3.5, §6.6

Hosking, Jeremy §3.2
Immigration and removals §5.2, §5.3, §5.4, §5.5, §5.6, §5.7, §5.8
Policy feasibility §5.1, §5.2, §5.10, §5.11, §5.12, §5.14
Preparation for government §7.1, §7.2, §7.3, §7.4, §7.5, §7.6, §7.7, §7.8
Reform UK §2.1, §2.2, §3.5, §4.7, §5.14, §7.8
Tice, Richard §3.3, §6.5